

810 Muirfield Road, Keller, TX 76248  
817.485.3532, 817.485.5916 (fax)

**Matthew McCullough**

# Fax

<b>To:</b> Dan Radulescu	<b>From:</b> Matt McCullough
<b>Fax:</b> 213.266.7600	<b>Pages:</b> 2
<b>Phone:</b> 213.266.7630	<b>Date:</b> 06/18/98
<b>Re:</b> Extension Request	Peter Nash-Shultz Steel, Ed Stewart-HLA
<input type="checkbox"/> Urgent	<input type="checkbox"/> For Review
<input type="checkbox"/> Please Reply	<input type="checkbox"/> Please Recycle

• **Comments:**

Please contact me at 817.485.3532 or [mccullough@home.com](mailto:mccullough@home.com) to respond to the attached extension request.

**Harding Lawson Associates**

June 18, 1998

Mr. Dan Radulescu  
State Water Resources Control Board, Los Angeles Region  
101 Centre Plaza Drive  
Monterey Park, CA 91754-2156

VIA FACSIMILE

*No extension provided*

**Request for Extension**  
**1997-98 Annual Report- Industrial Activities Storm Water General Permit**  
**Shultz Steel Company**  
**Facility WQID No. 4 19S002437**

Dear Mr. Radulescu,

Harding Lawson Associates (HLA) assist Shultz Steel Company (Facility ID No. 4 19S002437) with their storm water-related compliance issues. As you are aware, the 1997-98 Annual Report (Annual Report) is due July 1, 1998. We are requesting an extension to July 17, 1998 for submittal of the Annual Report due to the schedules of the various individuals involved in preparing this report.

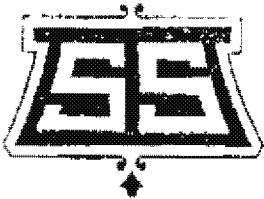
Please notify me at (817) 485-3532 or e-mail to [mmccullough@home.com](mailto:mmccullough@home.com) if you are unable to grant this request.

Yours Very Truly,  
**HARDING LAWSON ASSOCIATES**

  
Matthew McCullough, P.E.  
Principal Engineer

CC: Ed Stewart, HLA

C:\MY DOCUMENTS\HARDING LAWSON\SHULTZ\STIRN\



# SHULTZ STEEL COMPANY

## "TONS OF QUALITY"

5321 Firestone Boulevard  
South Gate, California 90280

75802437

Telephone: (213) 564-3281 Telex: 674674 Fax: (213) 564-4105

Please deliver the following to:

Name: MARK R. PUMFORD Company: STORMWATER UNIT

Location or Dept.: WATER CONTROL BOARD Extension: \_\_\_\_\_

Fax Number: 213/266-7600 Total Pages: \_\_\_\_\_  
Including this page: 2

From: PETER NASH - Dept.: PLANT ENGINEERING

Date Sent: 12/5/93 Time Sent: 11:30am Operator: \_\_\_\_\_

Special Instructions: PER ATTACHED LETTER - COMPLETED REPORT WAS SENT TO MR. CARLOS

URRANAGA - YOUR ADDRESS - OCTOBER 21, 1993

PLEASE ADVISE IF YOU HAVE THIS REPORT.

If you do not receive all the pages, please call sender as soon as possible.

This facsimile is intended only for the receipt and use by the identified addressee and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is neither the intended recipient nor the agent responsible for delivering this transmittal to the intended recipient, you are hereby notified that any use, distribution or copying of this transmittal is strictly prohibited. If you have received this transmittal in error, please notify us immediately by telephone and return original transmittal to the above address by mail. Thank You.

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7500  
FAX: (213) 266-7600

December 1, 1993

SHULTZ STEEL COMPANY  
5321 FIRESTONE BLVD.  
SOUTH GATE CA 90280

WDID: 4B19S002437

SUBMITTAL OF ANNUAL REPORT - GENERAL INDUSTRIAL STORM WATER PERMIT,  
STATE BOARD ORDER NO. 91-13-DWQ (AS AMENDED BY ORDER NO. 92-12-DWQ)  
NPDES NO. CAS000001.

July 1, 1993, was the deadline to submit the annual report for 1992-1993 season, as required by Section B.16 of the State General Industrial Storm Water Permit (General Permit). Our records indicate that a report has not been received.

We remind you that you must perform dry and wet weather inspections, sampling for the monitoring requirements, and the Storm Water Pollution Prevention Plan must be completed, on site, and implemented. Annual Reports are due each year by July 1.

By December 15, 1993, you are required to submit to the Regional Board a completed annual report questionnaire (enclosed). Failure to comply with the requirements of the General Permit, Section C.15 provides for penalties for violations of the General Permit conditions. In the event that you have already submitted an annual report or you are part of a Group Monitoring Plan with a common annual reports submittal, please notify the Regional Board by mail or fax.

If you have questions regarding the storm water program, or need assistance, please contact Dan Radulescu at (213) 266-~~7656~~.

A handwritten signature in cursive script, reading "Mark R. Pumford".

Mark R. Pumford, Chief  
Stormwater Unit

266-7630

Called

12/5/93-

NO ANSWER

Enclosure



**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

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A handwritten signature in dark ink, appearing to read "Mark R. Pumford", is written over a light-colored background.

Mark R. Pumford, Chief  
Stormwater Unit

Enclosure

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7500  
FAX: (213) 266-7600



January 27, 1995

Peter Nash  
Plant Engineer  
Shultz Steel Company  
5321 Firestone Blvd.  
South Gate, CA 90280

**COMPLIANCE WITH THE REQUIREMENTS OF THE GENERAL INDUSTRIAL  
ACTIVITIES STORM WATER PERMIT (NPDES CAS000001, WDID 4B19S002437)**

On January 11, 1995 a letter was received at the Regional Board from the Law Offices of Smiland & Khachigian, the firm representing your company. The letter was in response of the letter sent by the Executive Officer on November 9, 1994 regarding deficiencies identified at your plant in connection with the requirements of the General Industrial Activities Storm Water Permit (General Permit).

The proposed amendments to the Notice of Intent (NOI), Storm Water Pollution Prevention Plan (SWPPP) and Monitoring Plan (MP) are acceptable:

1. The site map accompanying the NOI was modified to indicate all points of discharge.
2. The SWPPP was modified to indicate the presence of a clarifier.
3. The MP was modified to describe the sampling location.

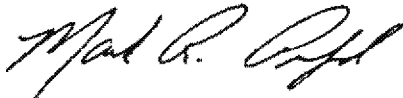
However, the modification to the MP did not include the analysis of toxic chemicals and other pollutants that are likely to be present in storm water discharges, as required by Section B.5.d.ii. of the General Permit and mentioned on page 3, paragraph one, of the MP. The on-site potential pollution sources are described on page 9, Table 1 of the MP. Therefore, you are directed to modify your MP to:

- A. Provide for sampling of toxic chemicals and other pollutants that are likely to be present in the storm water discharges, using the approved analytical methods (Section B.5.d.ii. of the General Permit).

The toxic pollutant analysis reduction procedures are stipulated in Section B.6. of the General Permit and mentioned on page 3, paragraph two, of the MP. You must update your SWPPP and MP no later than 30 days from the date you received this letter and submit a copy of the revised version to the Regional Board for review.

Page 2  
Peter Nash

We remind you that it is the discharger's responsibility to comply with all the requirements of the General Permit. Your contact for further information and assistance is Dan Radulescu at (213) 266-7630.

A handwritten signature in black ink, appearing to read "Mark R. Pumford". The signature is fluid and cursive, with the first name "Mark" being the most prominent.

Mark R. Pumford, Chief  
Stormwater Unit

cc: Christopher G. Foster, SMILAND & KHACHIGIAN

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

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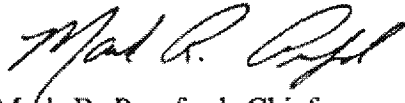
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Mark R. Pumford, Chief  
Stormwater Unit

cc: Christopher G. Foster, SMILAND & KHACHIGIAN

LAW OFFICES OF  
SMILAND & KHACHIGIAN

WILLIAM M. SMILAND  
KENNETH L. KHACHIGIAN  
THEODORE A. CHESTER, JR.  
CHRISTOPHER G. FOSTER

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SUITE 203  
209 AVENIDA DEL MAR  
SAN CLEMENTE, CALIFORNIA 92672  
TEL (714) 498-3879  
FAX (714) 498-6197

JOSEPH W. SWANWICK  
1858-1932  
CHARLES E. DONNELLY  
1890-1973

EMERITUS  
ERNEST M. CLARK, JR.

OF COUNSEL  
CHARLES H. CHASE

March 8, 1995

Mr. Robert P. Ghirelli  
Executive Officer  
California Regional Water Quality  
Control Board  
Los Angeles Region  
101 Center Plaza Drive  
Monterey Park, California 91754

Re: NPDES CAS000001,WDID 4B19S002437

Dear Mr. Ghirelli:

This firm represents Shultz Steel Company ("Shultz Steel") and this letter is written on its behalf in response to your letter to Peter Nash dated January 27, 1995.

Your January 27, 1995 letter directed Shultz Steel to modify its Monitoring Plan to

"A. Provide for sampling of toxic chemicals and other pollutants that are likely to be present in the storm water discharges, using the approved analytical methods (Section B.5.d.ii. of the General Permit)."

Shultz Steel's Monitoring Plan has been amended to provide for the requested sampling and analysis. Copies of the amended pages of the Monitoring Plan are enclosed with this letter.

If you have further questions regarding this matter, please do not hesitate to contact me.

Very truly yours,

  
Christopher G. Foster

CGF:k  
encl.  
cc: Mr. Dan Radulescu  
Mr. Peter Nash

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CGF:k

encl.

cc: Mr. Dan Radulescu ✓  
Mr. Peter Nash

## EXECUTIVE SUMMARY

The purpose of the Storm Water Monitoring Program (Monitoring Program) is to aid in evaluating the effectiveness of the Storm Water Pollution Prevention Plan (SWPPP) best management practices and to insure that non-storm water discharges do not impact storm water runoff from the facility. The Monitoring Program establishes sampling and inspection procedures to be conducted to meet the above objectives and to determine the following information:

- ▶ Rainfall Amount
- ▶ Storm Event Date
- ▶ Storm Duration
- ▶ Number of Hours from the Previous 0.1-inch of Rainfall
- ▶ Concentrations of Pollutants in Discharge
- ▶ Potential Sources of Non-Storm Water Discharge

Sampling will be conducted near the facility's main gates on Firestone Place. This location is thought to be representative of the discharge for the entire facility (See Figure 3 in the SWPPP). Samples of storm water discharge will be obtained from storm events for the purpose of quantifying specific pollutants potentially present in the discharge. The parameters for which storm water discharges from the facility will be sampled include the following:

- ▶ pH
- ▶ Total Suspended Solids
- ▶ Specific Conductance
- ▶ Oil and Grease
- ▶ Volatile Organics
- ▶ Metals (Lead & Zinc)

Evaluating the presence/absence of non-storm water discharges (discharges not related to a precipitation or runoff event) will occur during scheduled visual inspections and will be a criteria used to evaluate future facility modifications.

All storm water monitoring results will be reported by July 1 of each year to the Executive Officer of the Los Angeles Regional Water Quality Control Board. Each annual report will be signed and certified by a responsible corporate officer. The Storm Water Monitoring Program will be evaluated on a yearly basis at a time of preparation of the annual reports. If the Monitoring Program has not met its objectives, it will be amended at that time.



## **2.2 PARAMETERS OF CONCERN AND ANALYTICAL METHODS**

Samples collected will be analyzed for pH; total suspended solids (TSS); specific conductance; oil and grease; volatile organics; and metals. Table 1 lists the parameters for which storm water discharges from the facility will be sampled. The parameters for which the facility is monitoring are those required by the State Water Resources Control Board for the General Industrial Activity Storm Water Permit, and pollutants which have a reasonable potential to be present in storm water discharge in significant quantities. Also listed in Table 1 are the analytical method by which the samples are to be analyzed, as identified in 40 CFR 136, and the preservation method by which the samples are to be preserved from the time of collection to the time of analysis, as identified in Standard Methods for the Examination of Water and Wastewater, 17th Edition.

If a particular toxic chemical or pollutant is not detected in a significant quantity in samples collected after two consecutive sampling events, the facility will eliminate analysis for that toxic chemical or pollutant from future sampling events. For the purposes of this Monitoring Program, significant quantities of a chemical or pollutant are based upon ocean water receiving limits and experience with other NPDES permits. The limits used are listed in Table 2.

**TABLE 1**  
**PARAMETERS OF CONCERN AND ASSOCIATED**  
**ANALYTICAL, AND PRESERVATION METHODS**

PARAMETER	ANALYTICAL METHOD	COLLECTION CONTAINER AND MINIMUM QUANTITY	PRESERVATION METHOD
pH	EPA 150.1	Glass with teflon lined cap, 50 ml.	Measure immediately on-site, or store at 4°C (39°F) and analyze within 24 hours.
Total Suspended Solids (TSS)	EPA 160.2	Glass or plastic bottles, 500 ml.	Store at 4°C and analyze within 7 days.
Specific Conductance	EPA 120.1	Glass or plastic bottles, 250 ml.	Store at 4°C and analyze within 28 days.
Oil and Grease	EPA 413.2	Glass, wide-mouth 1 liter bottle, 3 liters.	Preserve with 3 to 4 drops of 1:1 concentrated H <sub>2</sub> SO <sub>4</sub> to pH < 2. Store at 4°C and analyze within 28 days.
Metals (Lead & Zinc)	EPA 6010 EPA 7950	Plastic Bottles, 500 ml.	Preserve with HNO <sub>3</sub> to pH < 2. Analyze within 6 months.
Volatile Organics (Aromatics & Halocarbons)	EPA 8020 EPA 8010	VOA-glass, 40 ml vials, 80 ml.	Store at 4°C and analyze within 7 days.

**TABLE 2**  
**GUIDELINES FOR STORM WATER DISCHARGE LIMITS**

PARAMETER	STORM WATER DISCHARGE LIMIT GUIDELINES
pH	> 5.0 and < 10.0
TSS	< 60 - 100 mg/l
Specific Conductance	< 200 $\mu$ mhos/cm
Oil and Grease	< 75 - 100 mg/l
Volatile Organics	Refer to <sup>(1)</sup>
Zinc	< 200 $\mu$ g/l
Lead	< 20 $\mu$ g/l

<sup>(1)</sup> "Water Quality Control Plan, Ocean Waters of California", Tables A and B, California Water Resources Control Board, 1990.

### 2.3 SAMPLING METHODS

Manual sampling will be conducted to collect samples. Sampling personnel will wear chemical-resistant gloves to minimize contact with the water samples. Samples will be collected in the appropriate container listed in Table 1 and stored accordingly. The samples will be placed in zip-lock plastic bags, packed in an ice-filled cooler, and submitted under chain-of-custody to a California State Certified Laboratory for analysis.

### 2.4 QUALITY ASSURANCE/QUALITY CONTROL PROGRAM

The quality assurance/quality control (QA/QC) program is to assure that all elements of the monitoring program are conducted, all monitoring is conducted by trained personnel, and that appropriate operating procedures are followed during each sample collection and analysis episode. The program consists of a QA/QC Checklist, Sample Tracking Form, sample labeling requirement, and sample analysis control. The components of the QA/QC program are described below.

LAW OFFICES OF  
SMILAND & KHACHIGIAN

WILLIAM M. SMILAND  
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THEODORE A. CHESTER, JR.  
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EMERITUS  
ERNEST M. CLARK, JR.

February 24, 1995

Mr. Dan Radulescu  
California Regional Water Quality  
Control Board, Los Angeles Region  
101 Center Plaza Drive  
Monterey Park, California 91754

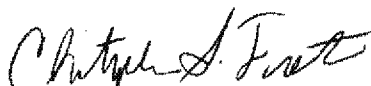
Re: NPDES CAS000001,WDID 4B19S002437

Dear Mr. Radulescu:

This letter is written following our telephone conversation discussing the letter dated January 27, 1995 from Mark R. Pumford of the Regional Board to Peter Nash at Shultz Steel Company concerning modifications to Shultz Steel's Monitoring Plan. As we agreed, Shultz Steel shall have until March 31, 1995 to submit the requested modifications to its Monitoring Plan.

Thank you for your cooperation in this matter.

Very truly yours,



Christopher G. Foster

CGF:k  
cc: Mr. Peter J. Nash

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7500  
FAX: (213) 266-7600



November 9, 1994

Peter Nash  
Plant Engineer  
Shultz Steel Company  
5321 Firestone Blvd.  
South Gate, CA 90280

**COMPLIANCE WITH THE REQUIREMENTS OF THE GENERAL INDUSTRIAL  
ACTIVITIES STORM WATER PERMIT (NPDES CAS000001, WDID 4B19S002437)**

On November 7, 1994, California Regional Water Quality Control Board staff (Board staff) performed an unannounced visit to your facility at 5321 Firestone Blvd. in South Gate and met with Mr. Peter Nash, Plant Engineer. The inspection is part of the Regional Board's comprehensive watershed management approach that has the goal to preserve and enhance the water quality of the water bodies in our region. One of the tasks in accomplishing this approach is to determine the level of compliance achieved by the facilities covered under the General Industrial Activities Storm Water Permit (General Permit). Board staff reviewed the Notice of Intent (NOI), Storm Water Pollution Prevention Plan (SWPPP), Monitoring Plan (MP), and Annual Reports submitted by your facility and identified the following deficiencies:

- a. The discharge point situated on the south east corner of the facility, consisting of a culvert built at the end of 1940's, beginning of 1950's beneath Firestone Blvd., is actually discharging runoff from the Shultz Steel Company to a neighboring facility. The discharge point was marked in the SWPPP as "closed clarifier", and was not mentioned on the site map attached to the Notice of Intent (NOI), contrary to the requirements of Section A.1.b.i. and A.1.b.ii. of the General Permit;
- b. The facility failed to sample all outfalls or offer an explanation on why a reduced number of outfalls were sampled, contrary to the requirements of Section B.4. of the General Permit;
- c. During the 1992-1993 and 1993-1994 seasons the samples were not analyzed for pH, oil and grease, total suspended solids and specific conductance, as required under Section B.5.d.i. of the General Permit; and
- d. The levels of petroleum hydrocarbons and metals in your storm water runoff tend to be elevated in some areas, based on the results submitted with the ARs.

Peter Nash  
Page 2

It is the discharger's responsibility to comply with all the requirements of the permit (Section C. of the General Permit). You are therefore directed to:

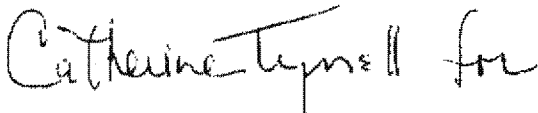
1. Update your NOI, identifying all points of discharge from your facility;
2. Revise the MP in order to comply with Section B.5.d. of the General Permit; and,
3. Revise the SWPPP in order to eliminate or to minimize exposure of storm water to potential pollutants, to the maximum extent possible.

You must revise your NOI and update your SWPPP and MP no later than 30 days from the date you received this letter and submit the revised documents to the Regional Board for review. Failure to comply with the permit requirements may lead to further enforcement actions (Section C.15.a., C.15.b. and C.19. of the General Permit).

Also, during the visit and discussion, Board staff emphasized the concepts of protecting storm water quality by Best Management Practices (BMPs) and pollution prevention techniques, reiterating the requirements existing in the General Permit. The "Storm Report" (the newsletter developed by the Regional Board staff to help the industrial permittees to self evaluate their performance and the efficiency of the SWPPP), lists benchmark levels for several pollutants. The "Storm Report" was designed as a tool to evaluate the sampling results obtained through the MP and submitted to the Regional Board in the Annual Reports (ARs). Where levels fall outside of the acceptable range for a contaminant, the SWPPP must be modified to explain how the management practices will be changed to mitigate the sources.

Costly modifications are not specifically required by the General Permit, only that exposure to be eliminated or minimized to the maximum extent possible. We suggest a thorough examination of alternatives for eliminating exposure and control of runoff discharges, consideration of structural controls when no other option is available.

Your contact for further information and assistance is Mark Pumford, Chief of our Stormwater Unit at (213) 266-7596 or Dan Radulescu at (213) 266-7630.



ROBERT P. GHIRELLI, D. Env.  
Executive Officer

cc: Mr. Jorge León, Office of Chief Counsel, State Water Resources Control Board  
Mr. William K. Koska, HAIGHT, BROWN & BONESTEEL

LAW OFFICES OF  
SMILAND & KHACHIGIAN

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Re: NPDES CAS000001,WDID 4B19S002437

Dear Mr. Ghirelli:

This firm represents Shultz Steel Company ("Shultz Steel") and this letter is written on its behalf in response to your letter to Peter Nash dated November 9, 1994. Your November 9, 1994 letter contained various observations and suggestions based on a November 7, 1994 site visit by Dan Radulescu. This letter contains responses to both the identified "deficiencies" and the actions Shultz Steel was directed to take.

The following comments respond to the alleged deficiencies:

a. The indirect discharge point situated at the southeast corner of the facility is a 34-inch diameter steel drainpipe. The drainpipe was designed, constructed and installed by the State of California, Department of Transportation in approximately 1950 in connection with raising the roadbed of Firestone Boulevard (then State Highway 42). The installation of this drainpipe was designed to preserve the area's natural drainage pattern. In approximately 1990 Shultz Steel installed a clarifier at the opening of the drainpipe. Figures 2 and 3 of Shultz Steel's Storm Water Pollution Prevention Plan ("SWPPP") have been amended to describe the area at the mouth of the drainpipe as a "clarifier." Neither the drainpipe nor any other indirect storm water discharge point was depicted on the site map accompanying Shultz Steel's Notice of Intent ("NOI"). It was Shultz Steel's interpretation and understanding of the General Instructions accompanying the NOI that the site map was only required to show the location of direct discharges to the Los Angeles County Flood Control System. However, based upon your suggestion Shultz Steel's NOI site map has been amended to indicate both direct and indirect discharge points.

Mr. Robert P. Ghirelli  
January 10, 1995  
Page 2

b. Samples were taken at a location representative of the storm water discharge from the entire facility. The Monitoring Program has been amended to reflect this sampling technique.

c. Due to oversight by the analytical laboratory analysis was not conducted for certain parameters set forth in the General Permit. The Monitoring Program has been amended to include analysis of all required parameters and all future samples will be analyzed according to the Monitoring Program.

The following comments respond to the actions Shultz Steel was directed to perform:

1. As discussed above, the site map accompanying the NOI has been amended to indicate both direct and indirect discharge points;

2. As discussed above, the Monitoring Program has been amended to describe the sampling location and to include analysis of all required parameters;

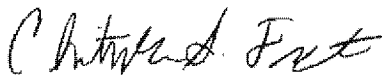
3. The SWPPP has been amended to indicate the existence of a "clarifier" in Figures 2 and 3 and pursuant to the SWPPP Shultz Steel will continue to review its management practices to eliminate or to minimize exposure of storm water to potential pollutants to the maximum extent possible.

Copies of the amended NOI site map, the amended Monitoring Program and the amended SWPPP are enclosed with this letter.

If you have further questions regarding this matter, please do not hesitate to contact me.

Very truly yours,

SMILAND & KHACHIGIAN

  
Christopher G. Foster

CGF:k  
encls.  
cc: Mr. Dan Radulescu  
Mr. Peter Nash



LAW OFFICES OF  
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JOSEPH W. SWANWICK  
1858-1932  
CHARLES E. DONNELLY  
1890-1973

EMERITUS  
ERNEST M. CLARK, JR.

January 10, 1995

Mr. Robert P. Ghirelli  
Executive officer  
California Regional Water Quality  
Control Board  
Los Angeles Region  
101 Center Plaza Drive  
Monterey Park, California 91754

Re: NPDES CAS000001,WDID 4B19S002437

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Mr. Robert P. Ghirelli  
January 10, 1995  
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Very truly yours,

SMILAND & KHACHIGIAN

  
Christopher G. Foster

CGF:k  
encls.  
cc: Mr. Dan Radulescu  
Mr. Peter Nash

## **EXECUTIVE SUMMARY**

The purpose of the Storm Water Monitoring Program (Monitoring Program) is to aid in evaluating the effectiveness of the Storm Water Pollution Prevention Plan (SWPPP) best management practices and to insure that non-storm water discharges do not impact storm water runoff from the facility. The Monitoring Program establishes sampling and inspection procedures to be conducted to meet the above objectives and to determine the following information:

- ▶ Rainfall Amount
- ▶ Storm Event Date
- ▶ Storm Duration
- ▶ Number of Hours from the Previous 0.1-inch of Rainfall
- ▶ Concentrations of Pollutants in Discharge
- ▶ Potential Sources of Non-Storm Water Discharge

Sampling will be conducted near the facility's main gates on Firestone Place. This location is thought to be representative of the discharge for the entire facility (See Figure 3 in the SWPPP). Samples of storm water discharge will be obtained from storm events for the purpose of quantifying specific pollutants potentially present in the discharge. The parameters for which storm water discharges from the facility will be sampled include the following:

- ▶ pH
- ▶ Total Suspended Solids
- ▶ Specific Conductance
- ▶ Oil and Grease

Evaluating the presence/absence of non-storm water discharges (discharges not related to a precipitation or runoff event) will occur during scheduled visual inspections and will be a criteria used to evaluate future facility modifications.

All storm water monitoring results will be reported by July 1 of each year to the Executive Officer of the Los Angeles Regional Water Quality Control Board. Each annual report will be signed and certified by a responsible corporate officer. The Storm Water Monitoring Program will be evaluated on a yearly basis at a time of preparation of the annual reports. If the Monitoring Program has not met its objectives, it will be amended at that time.

## **SECTION 2.0**

### **STORM WATER DISCHARGE MONITORING PLAN**

Information necessary to determine storm water discharge quality include the following storm event data and pollutant quantification data:

- ▶ Rainfall Amount
- ▶ Storm Event Date
- ▶ Storm Duration
- ▶ Number of Hours from the Previous 0.1-inch of Rainfall
- ▶ Concentrations of Pollutants in Discharge

Storm data will be obtained from the Los Angeles Airport Weather Data Station following each storm event. Pollutant quantification data will be obtained by sampling storm water discharged from the facility. When it is not possible to collect any of the required samples due to adverse weather conditions (i.e., drought, extended freeze, dangerous weather conditions, etc.) a description of why the samples could not be collected, including documentation of the event, will be submitted along with the annual monitoring report.

The monitoring frequency, parameters of concern and analytical methods, sampling methods, and quality assurance/quality control procedures for quantifying potential pollutants in discharge are described below.

#### **2.1 MONITORING FREQUENCY**

Sampling will be conducted near the facility's main gates on Firestone Place. This location is thought to be representative of the discharge for the entire facility.

Samples will be collected from at least one storm event during the 1992/1993 wet season, and two storm events for subsequent wet seasons. Samples will be collected from storms that produce significant<sup>1</sup> storm water discharge and that are preceded by at least 72 hours of dry weather, including the first storm event of the wet season. During each sampling episode, sampling of storm water will consist of collecting a first flush grab sample within the first thirty minutes of discharge. When the collection of the grab sample during the first thirty minutes is impracticable, the grab sample will be collected during the first hour of the discharge and an explanation will be included in the Annual Monitoring Report to describe why the grab sample could not be collected during the first thirty minutes.

---

<sup>1</sup> Significant storm water discharge is a continuous discharge of storm water for a minimum of one hour.

## **2.2 PARAMETERS OF CONCERN AND ANALYTICAL METHODS**

Samples collected will be analyzed for pH; total suspended solids (TSS); specific conductance; and oil and grease. Table 1 lists the parameters for which storm water discharges from the facility will be sampled. The parameters for which the facility is monitoring are those required by the State Water Resources Control Board for the General Industrial Activity Storm Water Permit, and pollutants which have a reasonable potential to be present in storm water discharge in significant quantities. Also listed in Table 1 are the analytical method by which the samples are to be analyzed, as identified in 40 CFR 136, and the preservation method by which the samples are to be preserved from the time of collection to the time of analysis, as identified in Standard Methods for the Examination of Water and Wastewater, 17th Edition.

If a particular toxic chemical or pollutant is not detected in a significant quantity in samples collected after two consecutive sampling events, the facility will eliminate analysis for that toxic chemical or pollutant from future sampling events. For the purposes of this Monitoring Program, significant quantities of a chemical or pollutant are based upon ocean water receiving limits and experience with other NPDES permits. The limits used are listed in Table 2.

**TABLE 1**  
**PARAMETERS OF CONCERN AND ASSOCIATED**  
**ANALYTICAL, AND PRESERVATION METHODS**

PARAMETER	ANALYTICAL METHOD	COLLECTION CONTAINER AND MINIMUM QUANTITY	PRESERVATION METHOD
pH	EPA 150.1	Glass with teflon lined cap, 50 ml.	Measure immediately on-site, or store at 4°C (39°F) and analyze within 24 hours.
Total Suspended Solids (TSS)	EPA 160.2	Glass or plastic bottles, 500 ml.	Store at 4°C and analyze within 7 days.
Specific Conductance	EPA 120.1	Glass or plastic bottles, 250 ml.	Store at 4°C and analyze within 28 days.
Oil and Grease	EPA 413.2	Glass, wide-mouth 1 liter bottle, 3 liters.	Preserve with 3 to 4 drops of 1:1 concentrated H <sub>2</sub> SO <sub>4</sub> to pH < 2. Store at 4°C and analyze within 28 days.

**TABLE 2**  
**GUIDELINES FOR STORM WATER DISCHARGE LIMITS**

PARAMETER	STORM WATER DISCHARGE LIMIT GUIDELINES
pH	> 5.0 and < 10.0
TSS	< 60 - 100 mg/l
Specific Conductance	< 200 $\mu$ mhos/cm
Oil and Grease	< 75 - 100 mg/l

<sup>1</sup> "Water Quality Control Plan, Ocean Waters of California", Tables A and B, California Water Resources Control Board, 1990.

### 2.3 SAMPLING METHODS

Manual sampling will be conducted to collect samples. Sampling personnel will wear chemical-resistant gloves to minimize contact with the water samples. Samples will be collected in the appropriate container listed in Table 1 and stored accordingly. The samples will be placed in zip-lock plastic bags, packed in an ice-filled cooler, and submitted under chain-of-custody to a California State Certified Laboratory for analysis.

### 2.4 QUALITY ASSURANCE/QUALITY CONTROL PROGRAM

The quality assurance/quality control (QA/QC) program is to assure that all elements of the monitoring program are conducted, all monitoring is conducted by trained personnel, and that appropriate operating procedures are followed during each sample collection and analysis episode. The program consists of a QA/QC Checklist, Sample Tracking Form, sample labeling requirement, and sample analysis control. The components of the QA/QC program are described below.

### **2.4.1 QA/QC Checklist**

A QA/QC Checklist will be used to ensure that all components of the QA/QC program are followed for each collection and analysis period. The components of the Checklist include:

- ▶ Date, name, and title of individual(s) performing the sampling and sample identification
- ▶ Confirmation that proper sample identification was provided; sample collection and preservation requirements were met; that proper chain-of-custody procedures were followed; and that sample tracking was completed.

A blank QA/QC Checklist is provided in Appendix A. Completed QA/QC Checklists will be retained in Appendix E.

### **2.4.2 Sample Tracking Form**

For each sampling or monitoring event, the following information will be recorded on the Sample Tracking Form.

- ▶ Date, exact place, and time of the sampling, observation, and/or measurement;
- ▶ Individual(s) who performed the sampling, observation, and/or measurement; and
- ▶ Standard observations (i.e., flow measurements, visual observations, etc).

A blank Sample Tracking Form is provided in Appendix A. Completed Sample Tracking Forms will be retained in Appendix E.



collected from grinding operations is stored in sheltered open bins and transported off-site for disposal approximately every 90 days.

**Cuttings and Turnings -**

Cuttings and turnings generated during facility operations are stored outdoors in unsheltered, unbermed open bins. Cuttings and turnings are transported off-site for recycling approximately weekly.

**Dies and Stock -**

Dies and stock used during facility operations are stored outdoors in unbermed, unsheltered storage enclosures.

**Process Tanks -**

Some process tanks, such as skim tanks and quench tanks, are in unsheltered areas. These tanks are typically covered when not in use.

**2.3.4**

***Existing Pollution Control Measures***

Described below are existing physical structures or buildings and management practices which reduce the potential of pollutants entering discharges to storm water.

**Sheltered Operations -**

The majority of the facility operations are conducted within areas sheltered from precipitation by means of an overhead structure or building. The entrances and exits to these areas are slightly pitched outward so as to aid in restricting flow into the sheltered area. Metal forming and grinding operations are all conducted within sheltered areas.

**Clarifier -**

A portion of the facility drains to a clarifier. Incidental spillage enters the drain system and is clarified prior to discharge to the industrial sewer system. Stormwater is indirectly discharged through the clarifier to the city's storm drain system.

**Bermed Storage -**

Petroleum products are dispensed in bermed enclosed areas. Any spills or precipitation is contained and recovered for recycling.

**Sheltered Storage -**

Some raw materials and wastes stored at the facility are kept indoors or within areas sheltered from precipitation.

**2.3.5**

***Industrial Storm Water Discharge Treatment Facilities***

No industrial storm water is treated before discharge.

**TABLE 1**  
**ON-SITE POTENTIAL POLLUTION SOURCES**

<b>SOURCE</b>	<b>POTENTIAL POLLUTANTS</b>	<b>LOCATION (FIGURE 2)</b>
Fueling Station	Fuel (petroleum hydrocarbons)	1
Oil Dispensing	Oil (petroleum hydrocarbons)	2
Waste Oil Recovery	Oil (petroleum hydrocarbons)	3
Unsheltered Component Steel and Die Storage	Oil (petroleum hydrocarbons)	4
Grinding and Baghouse Controls	Zinc, Lead	6 and 8
Clarifier	Oil (petroleum hydrocarbons)	7
Sheltered Process Tanks	Oil (petroleum hydrocarbons)	9 and 10

**TABLE 2****POTENTIAL POLLUTANTS AND EVALUATION OF THE POTENTIAL TO IMPACT STORM WATER DISCHARGES**

<b>SOURCE</b>	<b>POTENTIAL POLLUTANTS</b>	<b>CURRENT MANAGEMENT APPROACH</b>	<b>EVALUATION OF POTENTIAL TO IMPACT STORM WATER</b>
Fueling Station	Petroleum Hydrocarbons	Possibility of spills minimized by automatic shut off devices which protect against overfilling and spillage.	No impact as a result of normal daily operations expected
Oil dispensing	Petroleum Hydrocarbons	Possibility of spills minimized by bermed enclosure.	No impact as a result of normal daily operations expected
Waste Oil Recovery	Petroleum Hydrocarbons	Waste oil stored in an aboveground tank, covered to prevent the influx of precipitation.	No impact as a result of normal daily operations expected
Unsheltered Die and Component Steel Storage	Petroleum Hydrocarbons	Materials stored outside are in good condition and cleaned of free oil	No impact as a result of normal daily operations expected
Grinding and Baghouse Controls	Petroleum Hydrocarbons	Operations conducted within a sheltered area. Materials are stored in good condition and cleaned of free oil.	No impact as a result of normal daily operations expected
	Metals	Operations conducted with a sheltered area. Baghouse dust containerized.	No impact as a result of normal daily operations expected
Clarifier	Petroleum Hydrocarbons	Clarifier inspected to detect spills. During a storm, clarifier removes petroleum hydrocarbons.	No impact as a result of normal daily operations expected
Sheltered Process Tanks	Petroleum Hydrocarbons	Tanks routinely covered when not in use. Skim tank permanently covered. High freeboard maintained in all tanks.	No impact as a result of normal daily operations expected

LA RIVER

EMBANKMENT

BONEYARD

SHULTZ STEEL CO  
EXISTING BUILDING

SOLID MASONRY AND CONCRETE WALL

EXISTING BUILDINGS  
LINCOLN PROPERTIES

OFFICES/  
UNDERGROUND  
PARKING

VISITOR  
PARKING

FIRESTONE PLACE

RAYO AVENUE

PRESTONE BLVD.

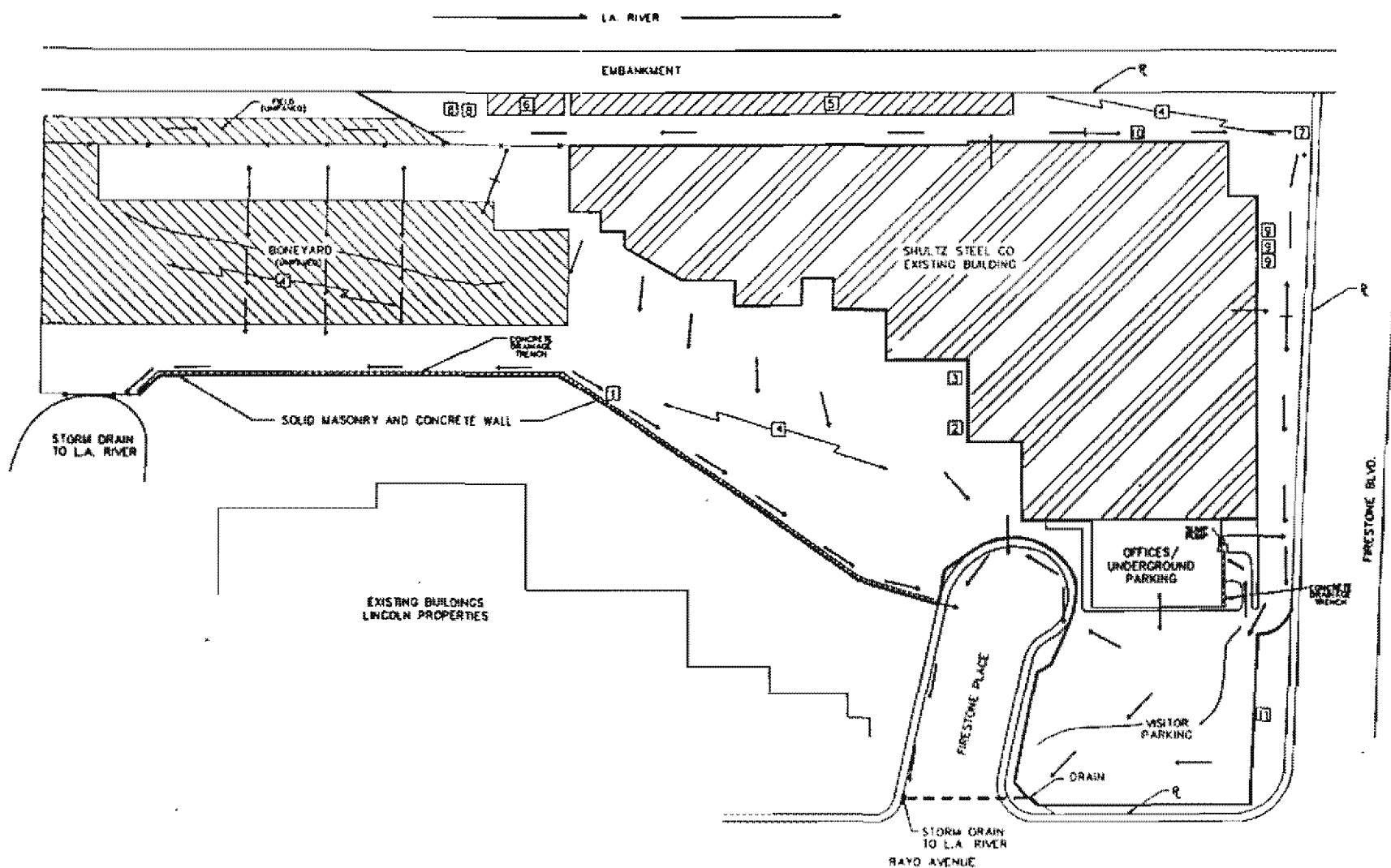
# LEGEND

- 1 FUELING STATION
- 2 OIL DISPENSING TANK
- 3 WASTE OIL RECOVERY
- 4 UNSHELTERED COMPONENT STEEL, DIE AND MATERIAL STORAGE
- 5 SHELTERED GRINDING
- 6 GRINDING (SHELTERED)
- 7 CLARIFIER
- 8 BAGHOUSE
- 9 QUENCH TANK
- 10 SKIM TANK
- 11 PROPANE TANK



FIGURE 2  
SITE MAP  
SHULTZ STEEL COMPANY  
FIRESTONE FACILITY

DRAWN BY C.V.	DATE 12/7/92	DATE BY ENGINEER	FILE
CHECKED BY	DATE	UNLESS OTHERWISE	SEE
APPROVED BY	DATE	SPECIFIED	DATE
SCALE 1" = 75'	NOTES	DRAWING NUMBER JUL123	



# LEGEND

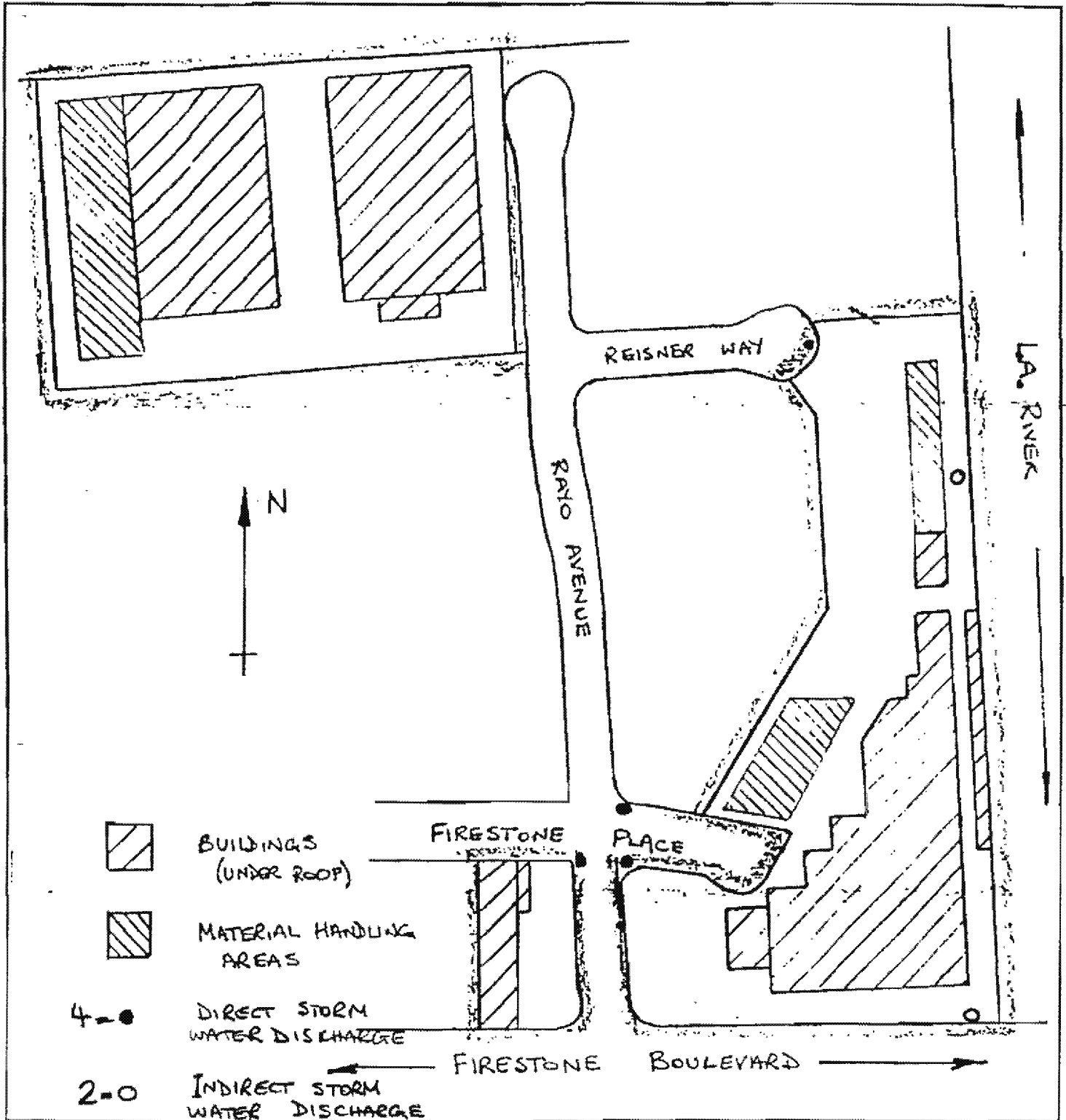
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- 11 PROPANE TANK



FIGURE 3  
DRAINAGE PATTERN MAP  
SHULTZ STEEL COMPANY  
FIRESTONE FACILITY

DESIGNED BY C.M.	DATE 12/7/93	UNIT OF MEASUREMENT WALSH & SHAPIRO	PRICE DEC.
CHECKED BY DATE		PROJECT HULTZ	NO.
APPROVED BY DATE		DRAWING NUMBER HULTZ3	
SCALE 1" = 75'	NOTES		

# NOTICE OF INTENT SITE MAP



## MAP INFORMATION

TYPE Copied from local parcel map drawings

NUMBER 002437

SCALE 1:2250 (approx)

STATE OF CALIFORNIA  
STATE WATER RESOURCES CONTROL BOARD

FACILITY SHULTZ STEEL COMPANY

COUNTY LOS ANGELES

REVISED

DATE 1-6-94

DRAWN  
PJN

CHECKED

DATE

LAW OFFICES OF  
SMILAND & KHACHIGIAN

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EMERITUS  
ERNEST M. CLARK, JR.

December 5, 1994

*File*

Mr. Dan Radulescu  
California Regional Water Quality  
Control Board  
Los Angeles Region  
101 Center Plaza Drive  
Monterey Park, California 91754

Re: Shultz Steel Company's Compliance With  
The Requirements of the General Industrial  
Activities Storm Water Permit  
(NPDES CAS000001,WDID/4B19S002437)

Dear Mr. Radulescu:

This law firm represents Shultz Steel Company ("Shultz Steel") and this letter is written on its behalf in response to the letter from Robert P. Ghirelli of the Regional Board to Peter Nash at Shultz Steel Company dated November 9, 1994. This letter will confirm our telephone conversation today in which you granted Shultz Steel an extension of time until January 10, 1994 within which to respond to the November 9, 1994 letter by revising its NOI and updating its SWPPP and MP.

Thank you for your cooperation in this matter.

Very truly yours,

SMILAND & KHACHIGIAN

*Christopher G. Foster*  
Christopher G. Foster

CGF:k  
cc: Mr. Peter Nash

LAW OFFICES OF  
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1890-1973

EMERITUS  
ERNEST M. CLARK, JR.

December 28, 1994

HAND DELIVERED

Mr. Dan Radulescu  
California Regional Water Quality  
Control Board  
Los Angeles Region  
101 Center Plaza Drive  
Monterey Park, California 91754

Re: NPDES CAS000001,WDID 4B19S002437


Dear Mr. Radulescu:

This firm represents Shultz Steel Company ("Shultz Steel") and this letter is written on its behalf in connection with a proposed amendment to Shultz Steel's Storm Water Pollution Prevention Plan (the "Plan"). In connection with the settlement of a lawsuit brought against Shultz Steel by The Dial Corp ("Dial"), Shultz Steel proposes to permanently seal, and thereby discontinue the use of, the indirect storm water discharge point labeled as number 7 "Closed Clarifier" on Figures 2 and 3 of the Plan. The City of South Gate has approved this project. Enclosed is a copy of the proposed Settlement Agreement And Mutual Release in connection with the litigation between Dial and Shultz Steel.

Please let me know if you have any comments or questions on the Agreement by January 9, 1995 because Shultz Steel plans to complete the sealing of the indirect discharge point no later than January 11, 1995. Once the indirect discharge point has been sealed Shultz Steel will prepare and file with the Regional Board an amendment to the Plan to so indicate.

Very truly yours,

SMILAND & KHACHIGIAN



Christopher G. Foster

CGF:k  
encl.  
cor94\1809-51.05



## SETTLEMENT AGREEMENT AND MUTUAL RELEASE

---

This Settlement Agreement and Mutual Release ("Agreement") is made and entered into as of December \_\_, 1994 by and among THE DIAL CORP, a Delaware corporation ("Dial"), SHULTZ STEEL COMPANY, a California corporation ("Shultz Steel") and SHULTZ PROPERTIES, INC., a California corporation ("Shultz Properties") (hereinafter referred to collectively as "Shultz"), the CITY OF SOUTH GATE ("South Gate"), the LOS ANGELES COUNTY FLOOD CONTROL DISTRICT ("Flood Control"), and the STATE OF CALIFORNIA, DEPARTMENT OF TRANSPORTATION ("CalTrans").

### I. RECITALS

A. Dial is the owner of certain real property commonly known as 9300 Rayo Avenue, City of South Gate, County of Los Angeles, State of California (the "Dial Property"). From approximately 1985 until December 1991 Dial operated a facility on the Dial Property for the manufacture of soap and bleach products. Dial's predecessor in interest, Purex Corporation, had previously operated a soap and bleach manufacturing facility on the Dial Property from approximately 1920 until 1985.

B. Shultz Properties is the owner of certain real property commonly known as 5321 Firestone Boulevard, City of South Gate, County of Los Angeles, State of California (the "Shultz Property"). Shultz Properties leases the Shultz Property to

Shultz Steel for the specific purpose of operating by Shultz Steel a steel fabricating plant.

C. The southern boundary of the Shultz Property and the northern boundary of the Dial Property are adjacent and are separated by Firestone Boulevard. In approximately 1950, in connection with raising the level of the roadbed of Firestone Boulevard, which was then known as California State Highway 42, CalTrans designed, constructed and installed a galvanized steel drainpipe approximately 100 feet in length and 34 inches in diameter running underneath Firestone Boulevard (the "Drainpipe") in order to preserve the natural drainage pattern of storm water between the Shultz Property and the Dial Property. The north end of the Drainpipe opens at the southeast corner of the Shultz Property. The south end of the Drainpipe opens at the northeast corner of the Dial Property. Due to the difference in elevation between the Shultz Property and the Dial Property and the grade at which the Drainpipe was installed substances can flow from the southeast corner of the Shultz Property through the Drainpipe onto the northeast corner of the Dial Property.

D. From the time of the Drainpipe's installation until October 13, 1993 CalTrans owned, operated, maintained and regulated the Drainpipe. On or about October 13, 1993 CalTrans relinquished its interest in the Drainpipe to South Gate pursuant to California Transportation Commission Resolution No. R3172 recorded in the Official Records of the Recorder's Office for the County of Los Angeles as Instrument No. 93 2353192. From October

13, 1993 until the date of execution of this Agreement South Gate has been and continues to be the owner of the Drainpipe.

E. On or about February 18, 1994 Dial filed its First Amended Complaint in Case No. VC 014998 against Shultz Steel and Shultz Properties for preliminary and permanent injunction and compensatory and declaratory relief. On October 26, 1994 Shultz Steel and Shultz Properties filed their First Amended Cross-Complaint against Dial, South Gate, Flood Control and CalTrans to quiet title to prescriptive easement, and for declaratory relief, negligence, breach of implied contract and indemnity. The above described complaint and cross-complaint are referred to herein collectively as the "Litigation."

## II. TERMS AND CONDITIONS

NOW, THEREFORE, for and in consideration of the payments, covenants, agreements and releases hereinafter set forth the parties do hereby agree as follows:

1. As part of the consideration for this Agreement, Shultz, South Gate and CalTrans shall pay to Dial the sum of \$73,750 (the "settlement payment"). The amounts paid by the parties are as follows:

- |    |            |          |
|----|------------|----------|
| a. | Shultz     | \$59,750 |
| b. | South Gate | \$9,000  |
| c. | CalTrans   | \$5,000  |

The settlement payment shall be made payable to "Haight, Brown & Bonesteel Client Trust Account" and shall be held in such account until disbursed to Dial.

2. On or before January 11, 1995 the Drainpipe shall be filled and permanently and imperviously sealed at both ends according to the specifications and proposal of Frize Corporation which specifications are hereby agreed to and accepted by all parties to this Agreement. The cost of filling the Drainpipe and sealing it at the Shultz Property shall be paid by Shultz. The cost of sealing the Drainpipe at the Dial Property shall be paid by Dial. Shultz waives any claim for damages from South Gate and agrees to hold South Gate harmless against any claims for water damage in connection with the filling and sealing of the Drainpipe.

3. Until such time as the work of filling and sealing the Drainpipe begins Shultz shall maintain the concrete barrier that is currently in place on the Shultz Property. Shultz shall prevent the flow of any substance through the Drainpipe during the time the Drainpipe is being filled and sealed.

4. Dial and Shultz shall enter into a stipulated permanent injunction enjoining and restraining Shultz from allowing the passage of any materials through the Drainpipe from the Shultz Property onto the Dial Property, which injunction shall run with the land for the benefit of the Dial Property (the "permanent injunction"). The permanent injunction shall be filed with the Court and recorded on or before January 12, 1995.

5. Shultz shall notify the Regional Water Quality Control Board, Los Angeles Region (the "Board") of the terms and conditions of this Agreement. The Board shall be given ten (10)

days from the date of Shultz's notification to comment on or object to this Agreement.

6. Dial and its attorneys shall waive the payment by Shultz and/or its attorneys of any sanctions ordered by the Court in the Litigation.

7. The parties to this Agreement hereby release one another from any and all claims with respect to the subject matter of the Litigation and from any and all actions, causes of action, claims, liens, suits, agreements, promises, demands, liabilities, obligations, damages and costs arising out of or related in any manner to the Litigation. Additionally, Dial further releases Shultz Steel and Shultz Properties from any actions, causes of action, claims, liens, suits, agreements, promises, demands, liabilities, obligations, damages and costs arising from any release, discharge, emission, or other such event, of any substance or substances deemed hazardous, toxic or dangerous to personal or public health pursuant to federal, state, or local laws or regulations or as so designated by any appropriate governmental agency with jurisdiction over the Dial Property whether presently known or unknown, and whether on, in or under the Dial Property.

8. In making the releases herein described Dial declares and represents that the ultimate cost of remediating the Dial Property on account of the substances referred to in the Litigation are unknown and likely may exceed all written and oral costs estimates for remediation provided to date.

9. Dial acknowledges it is aware of the risk that substances other than the substances referred to or related to the Litigation may exist on, in or under the Dial Property and, notwithstanding the same, Dial agrees to this release and discharge of Shultz Steel and Shultz Properties as expressed herein.

10. In making this Agreement, Dial understands and agrees that it relies wholly upon its own judgment, belief and knowledge and has not been influenced to any extent whatsoever in making this release by any representations or statements regarding the Litigation or any conditions on, in or under the Dial Property or any substances which may exist on, in or under the Dial Property whether known or unknown, or regarding any other matters, made by the persons, firms and corporations which are hereby released, or by any person or persons representing any of them.

11. This Agreement shall be construed without regard to the drafter of same and shall be construed as though all parties hereto participated equally in the drafting of the Agreement.

12. All parties acknowledge that they have been advised by legal counsel and are familiar with the provisions of California Civil Code Section 1542 which provides as follows:

"A general release does not extend to claims which the creditor does not know or suspect to exist in his favor at the time of executing the release, which if

known by him must have materially affected his settlement with the debtor."

All parties being aware of Section 1542 hereby expressly waive any and all rights that they may have thereunder. The parties understand and acknowledge the significance and consequences of the specific waiver of this Section 1542.

13. It is further understood and agreed that this Agreement is the compromise of a doubtful and disputed claim and that entering into and complying with any or all terms of this Agreement is not to be construed as an admission of liability by any parties hereto all of whom expressly deny liability to any of the other parties hereto.

14. On or before January 10, 1995 all plaintiff and cross-complainant parties will prepare fully executed requests for dismissal for all defendant and cross-defendant parties, to be held by plaintiff's attorneys until the settlement payment is disbursed and the Agreement fully performed.

15. All documents and notices required under, or pertaining to, this Agreement shall be sent by first class mail to the following representatives of the indicated parties.

(1) For Dial:

William K. Koska, Esq.  
Haight, Brown & Bonesteel  
1620 - 26th Street, Suite 4000 North  
P. O. Box 680  
Santa Monica, CA 90406-0680

(2) For Shultz:

William M. Smiland, Esq.  
Smiland & Khachigian  
601 West Fifth Street, Seventh Floor  
Los Angeles, CA 90071-2004

(3) For South Gate:

Scott S. Widitor, Deputy City Attorney  
Alvarez-Glasman & Colvin  
200 East Beverly Boulevard, Second Floor  
Montebello, CA 90640

(4) For CalTrans:

Corinne Lee, Esq.  
The State of California  
Department of Transportation  
Legal Division  
865 South Figueroa Street, Suite 400  
P. O. Box 15076  
Los Angeles, CA 90015

(5) For Flood Control:

Judith A. Fries, Esq.  
Principal Deputy County Counsel  
652 Hall of Administration  
500 West Temple Street  
Los Angeles, CA 90012

Any party may designate another address for notice by giving written notice thereof to the other parties to this Agreement.

16. This Agreement may be executed simultaneously in one or more counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument.

17. This Agreement is made and entered into in the State of California and shall in all respects be interpreted, enforced and governed by and under the laws of the State of California.



18. This Agreement constitutes the entire agreement between the parties pertaining to the subject matter contained in it and supersedes all prior agreements, representations and understandings of the parties. No supplement, modification or amendment to this Agreement shall be binding unless executed in writing by all parties.

19. The parties to this Agreement represent to each other that they have not heretofore assigned, transferred, or purported to assign or transfer, to any person not a party hereto, any claim, demand, or cause of action, or any part or portion thereof, released by this Agreement and they agree to indemnify and hold harmless each other from and against any claim, demand, damage, liability, obligation, cost, expense, lien, action or cause of action based on, in connection with or arising out of any assignment or transfer or purported assignment or transfer.

20. This Agreement shall be binding on the parties to it and their respective legal representatives, successors, assigns, heirs, executors and administrators.

21. If the settlement payment is not disbursed and this Agreement is not fully performed by January 12, 1995 Dial shall have the right to move the Court to restore the Litigation to the civil active list and to set a trial date. However, if that portion of the settlement payment due from CalTrans has not been paid by January 12, 1995 and all other parties to this Agreement have fully performed then Dial shall not have the right to move the Court to restore the Litigation to the civil active

list and instead shall have only the right to receive such payment from CalTrans.

IN WITNESS WHEREOF, the parties hereto have executed this Settlement Agreement and Mutual Release as of the date first above written.

APPROVED:

HAIGHT, BROWN & BONESTEEL

By \_\_\_\_\_  
William K. Koska

THE DIAL CORP

By \_\_\_\_\_

Its \_\_\_\_\_

APPROVED:

SMILAND & KHACHIGIAN

By \_\_\_\_\_  
William M. Smiland

SHULTZ STEEL COMPANY

By \_\_\_\_\_

Its \_\_\_\_\_

SHULTZ PROPERTIES, INC.

By \_\_\_\_\_

Its \_\_\_\_\_

APPROVED:

ALVAREZ-GLASMAN & COLVIN

By \_\_\_\_\_  
Scott S. Widitor

CITY OF SOUTH GATE

By \_\_\_\_\_

Its \_\_\_\_\_

APPROVED:

DEPARTMENT OF TRANSPORTATION  
LEGAL DIVISION

By \_\_\_\_\_  
Corinne Lee

THE STATE OF CALIFORNIA  
DEPARTMENT OF TRANSPORTATION

By \_\_\_\_\_

Its \_\_\_\_\_

APPROVED:

LOS ANGELES COUNTY COUNSEL

By \_\_\_\_\_  
Judith A. Fries

LOS ANGELES COUNTY  
FLOOD CONTROL DISTRICT

By \_\_\_\_\_

Its \_\_\_\_\_

# CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD LOS ANGELES REGION

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156

(213) 266-7500

FAX: (213) 266-7600

## GENERAL STORM WATER INSPECTION REPORT



Date: NOV 7 1994

Time: 1:00 PM

Inspector: DAN RADULESCU WRCE  
CRWQCB LA REGION  
PHONE 213 266 7630  
FAX 213 266 7600

### GENERAL INFORMATION

Facility: Schultz Steel Company

Address: 5521 Firestone Blvd

Facility Contact: Plant Engineer: Phone: (213) 564-3281

Others in Attendance: \_\_\_\_\_

Type of operation: Fabricated metal Products

Size of Facility: \_\_\_\_\_ SIC: 3460

WDID #: 483195002437

Permit Type: \_\_\_\_\_

Discharge Category: [40CFR122.26(b)(14) X1]

Weather Conditions: \_\_\_\_\_

### FACILITY INSPECTION

yes no

comments

1. Are raw materials stored covered and in a bermed area?

a. Are containers properly labeled?

2. Are wastes generated on site? What type?

a. If so, are the receptacles in good condition?

b. Tightly closed?

c. Properly Labeled?

FACILITY INSPECTION cont'd:

<u>yes</u>	<u>no</u>		<u>comments</u>
—	—	d. Stored outdoors?	_____
—	—	e. Covered to prevent exposure to storm water?	_____
—	—	f. Stored within a bermed area or other type of containment?	_____
—	—	3. Do any processes at the facility generate hazardous wastes?	_____
		a. What types of wastes?	_____
		b. From what types of processes?	_____
—	—	c. Is the containment system adequate for collection of SW and/or spills? (e.g. sump, pump)	_____
—	—	d. Does it have backup to contain flooding (such as sumps, tanks, treatment systems, etc.)	_____
—	—	e. Do the hazardous wastes remain on site?	_____
—	—	f. What is the storage time?	_____
—	—	g. Are the hazardous wastes treated on site?	_____
—	—	h. Does the method of treatment include treatment of SW first flush?	_____
—	—	4. Does the facility have an SPCC?	_____
—	—	5. Does the facility change any practices for different weather conditions?	_____
—	—	6. Is vehicle/equipment maintenance done on site?	_____
—	—	a. If so, is the maintenance area covered?	_____
		b. What type of maintenance is being performed?	_____

FACILITY INSPECTION cont'd:

yes    no

comments

- \_\_\_\_    \_\_\_\_    7.    Are Dumpsters/Trash bins  
                      covered or kept in an en-  
                      closed area?
- \_\_\_\_    \_\_\_\_        a.    Are they watertight?
- \_\_\_\_    \_\_\_\_    8.    Are BMPs practiced?
9.    How are BMPs effectiveness  
                              measured?

SWPPP

yes    no

comments

- \_\_\_\_    \_\_\_\_    1.    SWPPP on site?
- \_\_\_\_    \_\_\_\_        a.    Is it being implemented?
- b.    What is implementation  
                              schedule?
2.    Indicate additional BMPs  
                              not previously mentioned.
- d.    How are BMPs effective-  
                              ness measured?

NON-STORM WATER DISCHARGE:

yes    no

comments

- \_\_\_\_    \_\_\_\_    1.    Do non-storm water dis-  
                      charges exist?
- a.    If non-storm water dis-  
                              charges do exist what  
                              are plans to eliminate?
- b.    What is time frame to  
                              eliminate?

MONITORING PROGRAM:

<u>yes</u>	<u>no</u>		<u>comments</u>
___	___	1. Monitoring program on site?	_____ _____
___	___	2. Is sampling done by lab? (If so, name of lab?)	_____ _____
___	___	a. Is lab certified?	_____
___	___	3. Is sampling done by a trained employee? If so, name?	_____ _____
		a. Type of training?	_____
		4. What parameters are being analyzed?	_____ _____ _____
		5. What is sampling protocol?	_____ _____ _____
___	___	6. Was grab sample taken by inspector during inspection?	_____ _____
___	___	7. Were dry weather discharges observed?	_____ _____
___	___	8. Is there a dry weather runoff diversion or containment plan?	_____ _____
___	___	9. Were wet weather discharges observed?	_____ _____
___	___	10. Is sediment/erosion being controlled?	_____ _____
___	___	11. Is the facility following good housekeeping?	_____ _____

CONCLUSIONS/RECOMMENDATIONS:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

SCHEMATIC DIAGRAM OF FACILITY:

Indicate;

Perimeter of facility, property lines, run-off flow, discharge points, non-storm water discharge locations, location at which grab sample was taken, vehicle/equipment maintenance site, materials and waste storage locations.

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NOTES:

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—  
LOS ANGELES REGION

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CALIFORNIA 91754-2156  
(213) 266-7500



FAX NO. (213) 266-7600

DATE: NOV 15 1994

TO: Chris Foster

FROM:

Re: Shultz Steel Letter

DAN RADULESCU SEA  
CRWQCB LA REGION  
PHONE 213 266 7630  
FAX 213 266 7600

FAX NO. (213) 891 1414

NUMBER OF PAGES SENT (INCLUDING THIS COVER PAGE): 3

PLEASE CONTACT PERSON BELOW TO CONFIRM RECEIPT.

NAME: dr

NUMBER: (213) 266 7630

Sir,

These are the values I promised you. Sorry about the delay  
R. M. H.

TABLE 6.—STORM WATER MONITORING REQUIREMENTS—Continued

Industrial activity	Section of fact sheet describing monitoring requirements	Permit section describing monitoring requirements
Hazardous Waste Treatment, Storage, or Disposal Facilities	VIII.K.7	XI.K.5
Landfills and Land Application Sites	VIII.L.6	XI.L.5
Automobile Salvage Yards	VIII.M.6	XI.M.5
Scrap and Waste Material Processing and Recycling Facilities	VIII.N.6	XI.N.5
Steam Electric Power Generating Facilities, Including Coal Handling Areas	VIII.O.6	XI.O.5
Vehicle Maintenance or Equipment Cleaning Areas at Motor Freight Transportation Facilities, Passenger Transportation Facilities, Petroleum Bulk Oil Stations and Terminals, Rail Transportation Facilities, and the United States Postal Service Transportation Facilities	VIII.P.6	XI.P.5
Vehicle Maintenance Areas and/or Equipment Cleaning Operations at Water Transportation Facilities	VIII.Q.6	XI.Q.5
Ship and Boat Building or Repairing Yards	VIII.R.6	XI.R.5
Vehicle Maintenance Areas, Equipment Cleaning Areas, or Deicing Areas Located at Air Transportation Facilities	VIII.S.6	XI.S.5
Treatment Works	VIII.T.8	XI.T.5
Food and Kindred Products Facilities	VIII.U.5	XI.U.5
Textile Mills, Apparel, and Other Fabric Product Manufacturing Facilities	VIII.V.6	XI.V.5
Wood and Metal Furniture and Fixture Manufacturing Facilities	VIII.W.5	XI.W.5
Printing and Publishing Facilities	VIII.X.7	XI.X.5
Rubber, Miscellaneous Plastic Products, and Miscellaneous Manufacturing Industries	VIII.Y.7	XI.Y.5
Leather Tanning and Finishing Facilities	VIII.Z.7	XI.Z.5
Fabricated Metal Products Industry	VIII.AA.7	XI.AA.5
Facilities That Manufacture Transportation Equipment, Industrial, or Commercial Machinery	VIII.AB.7	XI.AB.5
Facilities That Manufacture Electronic and Electrical Equipment and Components, Photographic and Optical Goods.	VIII.AC.7	XI.AC.5

After Part 2 monitoring data were entered, EPA conducted statistical analyses of the group Part 2 data for each parameter within every industrial sector. Each pollutant with three or more observations, within an industrial sector, was identified as a pollutant of potential concern. For each pollutant of

concern, EPA established bench mark values to which the pollutant statistics would be compared for each industrial sector. The primary source of the bench mark values are NURP (National Urban Runoff Program) median values for Form 2-F, Part VII, Part A pollutant parameters and Gold Book Values for

Form 2-F, Section VII, Parts B and C pollutant parameters. The pollutants, bench mark values, and source of the bench mark values are indicated below in Table 7. EPA requests comments on the bench mark levels and the sources used to determine the bench mark values.

TABLE 7.—POLLUTANT BENCH MARK VALUES

Pollutant name	Bench mark level	Source
Biological Oxygen Demand(5)	9 mg/L	7
Chemical Oxygen Demand	65 mg/L	7
Total Suspended Solids	100 mg/L	7
Total Kjeldahl Nitrogen	105 mg/L	7
Nitrate+Nitrite Nitrogen	0.68 mg/L	7
Total Phosphorus	0.33 mg/L	7
pH	6.5-9 s.u.	8
1,1,1-Trichloroethane	3.1 mg/L	3
Acrylonitrile (c)	7.55 mg/L	2
Aluminum, Total (pH 6.5-9)	0.75 mg/L	1
Ammonia (as Nitrogen, un-ionized)	19 mg/L	1
Antimony, Total	0.088 mg/L	1
Arsenic, Total (c)	0.00018 mg/L	3
Barium, Total	1.0 mg/L	4
Benzene (c,s)	5.3 mg/L	2
Beryllium, Total (c)	0.13 mg/L	2
Bis(2-ethylhexyl) Phthalate	3 mg/L	3
Cadmium, Total (H)	0.0018 mg/L	1
Chloride	860 mg/L	1
Copper, Total (H)	0.009 mg/L	1
Dimethyl Phthalate	313 mg/L	3
Ethylbenzene	32 mg/L	2
Fluoranthene	3.98 mg/L	2
Iron, Total	0.3 mg/L	3
Lead, Total (H)	0.0337 mg/L	1
Manganese	0.05 mg/L	3
Mercury, Total	0.0024 mg/L	1
Methylene Chloride	0.0047 mg/L	3
Naphthalene	2.3 mg/L	2

TABLE 7.—POLLUTANT BENCHMARK VALUES—Continued

Pollutant name	Benchmark level	Source
Nickel, Total (H)	0.7884 mg/L	1
PCB-1016 (c)	0.00000044 mg/L	3
PCB-1221 (c)	0.00000044 mg/L	3
PCB-1232 (c)	0.00000044 mg/L	3
PCB-1242 (c)	0.00000044 mg/L	3
PCB-1248 (c)	0.00000044 mg/L	3
PCB-1254 (c)	0.00000044 mg/L	3
PCB-1260 (c)	0.00000044 mg/L	3
Phenanthrene (PAH)(c)	0.03 mg/L	1
Phenols, Total	10.2 mg/L	2
Pyrene (PAH)(c)	0.0000028 mg/L	3
Selenium, Total	0.02 mg/L	1
Silver, Total (H)	0.0009 mg/L	1
Toluene	17.5 mg/L	2
Trichloroethylene (c)	45 mg/L	2
Zinc, Total (H)	0.065 mg/L	1

## Sources:

1. "EPA Recommended Ambient Water Quality Criteria." Acute Aquatic Life Freshwater
2. "EPA Recommended Ambient Water Quality Criteria." LOEL Acute Freshwater
3. "EPA Recommended Ambient Water Quality Criteria." Human Health Criteria for Consumption of Water and Organisms
4. "EPA Recommended Ambient Water Quality Criteria." Human Health Criteria for Consumption of Organisms Only
5. "EPA Recommended Ambient Water Quality Criteria." Acute Aquatic Life Marine
6. "EPA Recommended Ambient Water Quality Criteria." LOEL Acute Marine
7. NURP
8. "EPA Recommended Ambient Water Quality Criteria." Chronic Aquatic Life Freshwater NA. Benchmark value was not available.

## Notes:

- (c) carcinogen  
 (H) hardness dependent  
 (PAH) Polynuclear Aromatic Hydrocarbon  
 (s) Displayed standard is for Total Aromatic Hydrocarbons, which supersedes the criteria for Benzene.  
 (y) Storm water effluent limitations guidelines are not appropriate.

## Assumptions:

- Receiving water temperature—20 C  
 Receiving water pH—7  
 Receiving water hardness mg/L CaCO<sub>3</sub>—60  
 Receiving water salinity g/kg—20  
 Acute to Chronic Ratio (ACR)—10

In determining industry-specific monitor requirements, EPA conducted statistical analyses for all pollutants submitted by facilities within an industrial sector. For each pollutant with three or more observations, EPA compared the industry's median values with the benchmark values indicated in Table 7. Comparisons were not conducted for pollutants with two or less observations within a sector. Median values were used for comparison purposes because the median indicates the 50th percentile of all the observations submitted for a particular pollutant. EPA did not select the mean, or average, industrial value for comparison purposes because this value is more susceptible to outliers.

Almost all industry sectors had at least one pollutant with a median concentration higher than the benchmark level. However, EPA believes that analytical monitoring

requirements on all industrial activities may be excessive. Therefore, EPA proposes to require monitoring only for "priority" industrial activities. EPA has selected five pollutants with median concentrations above benchmark levels as one criterion for selection as a priority sector. Therefore, if the sector had median values greater than benchmark values for five, or more, parameters the industry was identified for analytical monitoring. If the sector had median values greater than benchmark values for four, or less, parameters the industry would only need to conduct visual inspections of storm water discharges. There was no consideration of type of parameter (toxic, carcinogenic, or conventional) when identifying the industries that would be required to sample their storm water discharges. All pollutants bore equal weight. EPA requests comments for selecting five pollutants greater than

benchmark values as the determination for whether or not all facilities within an industry would be required to conduct storm water discharge monitoring.

Discharges from the following industries were identified as requiring analytical monitoring as a result of the prioritization analysis: Facilities engaged in wood preserving or wood surface treatment, chemical and allied products manufacturing facilities, concrete and clay products manufacturing facilities, primary metals facilities, ore mining and dressing facilities, landfills and land application sites, scrap and waste material processing and recycling facilities, steam electric generating facilities, ship and boat building and repair yards, waste water treatment works, food and kindred products facilities, leather tanning and finishing facilities, and fabricated metal products facilities.

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—  
LOS ANGELES REGION101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CALIFORNIA 91754-2156  
(213) 266-7500

FAX NO. (213) 266-7600

DATE: NOV 4 1994

TO: Jorge Leon  
Office of Chief Counsel

FROM:

DAN RADULESCU WRCE  
CRWQCB LA REGION  
PHONE 213 266 7630  
FAX 213 266 7600FAX NO. (916) 653 0428NUMBER OF PAGES SENT (INCLUDING THIS COVER PAGE): 2

PLEASE CONTACT PERSON BELOW TO CONFIRM RECEIPT.

NAME: drNUMBER: (213) 266 7630

Dear Mr. Leon,

I received this subpoena from the attorney representing the Dial Corp. They sent us, all kinds of documents during a period of time, but I didn't understand the requests, and frankly I didn't have time to review the case that started years ago, before the stormwater regulations were in place. I think, Mark Pumphord, our chief, will be also subpoenaed. What can I do, except going there?

Thank you, D. H. H.



PLAINTIFF/PETITIONER: The Dill Corp

CASE NUMBER:

VC 014 998

DEFENDANT/RESPONDENT: Shultz Steel Company, et al.

### PROOF OF SERVICE OF CIVIL SUBPENA

1. I served this ☐ Subpena ☐ Subpena Duces Tecum and supporting affidavit by personally delivering a copy to the person served as follows:

a. Person served (*name*):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. Witness fees (*check one*):

(1) ☐ were offered or demanded  
and paid. Amount: ..... \$ \_\_\_\_\_

(2) ☐ were not demanded or paid.

f. Fee for service: ..... \$ \_\_\_\_\_

2. I received this subpoena for service on (*date*):

3. Person serving:

a. ☐ Not a registered California process server.

b. ☐ California sheriff, marshal, or constable.

c. ☐ Registered California process server.

d. ☐ Employee or independent contractor of a registered California process server.

e. ☐ Exempt from registration under Bus. & Prof. Code section 22350(b).

f. ☐ Registered professional photocopier.

g. ☐ Exempt from registration under Bus. & Prof. Code section 22451.

h. Name, address, and telephone number and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:



(SIGNATURE)

(For California sheriff, marshal, or constable use only)  
I certify that the foregoing is true and correct.

Date:



(SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address):

TELEPHONE NO.:  
(310) 449-6000

FOR COURT USE ONLY

William K. Koska, Esq.  
HAIGHT, BROWN & BONESTEEL  
1620 26th Street, Suite 4000 North  
SANTA MONICA, CALIFORNIA 90404

ATTORNEY FOR (Name): Plaintiff, The Dial Corp

NAME OF COURT: LASC

STREET ADDRESS: 12720 Norwalk Boulevard

MAILING ADDRESS:

CITY AND ZIP CODE: Norwalk, CA 90650

BRANCH NAME: Norwalk

PLAINTIFF/PETITIONER: The Dial Corp

DEFENDANT/RESPONDENT: Shultz Steel Company, et al.

## CIVIL SUBPENA

☐ Duces Tecum

CASE NUMBER:

VC 014 998

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (NAME): DAN RADULESCU, CALIFORNIA REGIONAL  
WATER QUALITY CONTROL BOARD, LOS ANGELES REGION, 101 CENTRE PLAZA DRIVE,  
MONTEREY PARK, CA 91754-2156

1. YOU ARE ORDERED TO APPEAR AS A WITNESS in this action at the date, time, and place shown in the box below UNLESS you  
make a special agreement with the person named in item 3:

a. Date: November 10, 1994 Time: 9:30 a.m. ☒ Dept: "F" ☐ Div.: ☐ Room:  
b. Address: 12720 Norwalk Boulevard  
Norwalk, CA 90650

## 2. AND YOU ARE

- a. ☒ ordered to appear in person.
- b. ☐ not required to appear in person if you produce the records described in the accompanying affidavit and a completed declaration of custodian of records in compliance with Evidence Code sections 1560, 1561, 1562, and 1271. (1) Place a copy of the records in an envelope (or other wrapper). Enclose your original declaration with the records. Seal them. (2) Attach a copy of this subpoena to the envelope or write on the envelope the case name and number, your name and date, time, and place from item 1 (the box above). (3) Place this first envelope in an outer envelope, seal it, and mail it to the clerk of the court at the address in item 1. (4) Mail a copy of your declaration to the attorney or party shown at the top of this form.
- c. ☐ ordered to appear in person and to produce the records described in the accompanying affidavit. The personal attendance of the custodian or other qualified witness and the production of the original records is required by this subpoena. The procedure authorized by subdivision (b) of section 1560, and sections 1561 and 1562, of the Evidence Code will not be deemed sufficient compliance with this subpoena.

## 3. IF YOU HAVE ANY QUESTIONS ABOUT THE TIME OR DATE FOR YOU TO APPEAR, OR IF YOU WANT TO BE CERTAIN THAT YOUR PRESENCE IS REQUIRED, CONTACT THE FOLLOWING PERSON BEFORE THE DATE ON WHICH YOU ARE TO APPEAR:

a. Name: William K. Koska, Esq. b. Telephone number: (310) 449-6000

## 4. Witness Fees: You are entitled to witness fees and mileage actually traveled both ways, as provided by law, if you request them at the time of service. You may request them before your scheduled appearance from the person named in item 3.

DISOBEDIENCE OF THIS SUBPENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: November 4, 1994

For Court Use Only



JAMES H. DEMPSEY  
(TYPE OR PRINT NAME)

*[Signature]*  
(SIGNATURE OF PERSON ISSUING SUBPENA)

County Clerk/Executive Officer of the Superior Court  
(TITLE)

(See reverse for proof of service)

PLAINTIFF/PETITIONER: The Dia. Corp

CASE NUMBER:

VC 014 998

DEFENDANT/RESPONDENT: Shultz Steel Company, et al.

### PROOF OF SERVICE OF CIVIL SUBPENA

1. I served this ☐ Subpena ☐ Subpena Duces Tecum and supporting affidavit by personally delivering a copy to the person served as follows:

a. Person served (*name*):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. Witness fees (*check one*):

(1) ☐ were offered or demanded  
and paid. Amount: ..... \$ \_\_\_\_\_

(2) ☐ were not demanded or paid.

f. Fee for service: ..... \$ \_\_\_\_\_

2. I received this subpoena for service on (*date*):

3. Person serving:

a. ☐ Not a registered California process server.

b. ☐ California sheriff, marshal, or constable.

c. ☐ Registered California process server.

d. ☐ Employee or independent contractor of a registered California process server.

e. ☐ Exempt from registration under Bus. & Prof. Code section 22350(b).

f. ☐ Registered professional photocopier.

g. ☐ Exempt from registration under Bus. & Prof. Code section 22451.

h. Name, address, and telephone number and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(For California sheriff, marshal, or constable use only)  
I certify that the foregoing is true and correct.

Date:



(SIGNATURE)



(SIGNATURE)

PROOF OF SERVICE  
CIVIL SUBPENA



CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—  
LOS ANGELES REGION101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CALIFORNIA 91754-2156  
(213) 266-7500

FAX NO. (213) 266-7600

DATE: NOV 7 1994TO: Jorge Leon  
Office of Chief Counsel

FROM:

DAN RADULESCU WRCE  
CRWQCB LA REGION  
PHONE 213 266 7630  
FAX 213 266 7600FAX NO. (916) 653 0428NUMBER OF PAGES SENT (INCLUDING THIS COVER PAGE): 3

PLEASE CONTACT PERSON BELOW TO CONFIRM RECEIPT.

NAME: drNUMBER: (213) 266 7630

Dear Mr. Leon,

I drafted a letter for the Shultz Steel Company, directing them to update their NOI, if they did not do so. More than that, at this time, I do not know what we really can do. We have other 2500 facilities under the permit and many more w/o a permit, we have to arrest also. In my opinion, there are no major violations, comparing with the reality of the situation, as a whole.

Thank you,

Post-It™ brand fax transmittal memo 7671		# of pages ▶ 2
To: <i>Herlan Christensen</i>	From: <i>Dan Radulovic WTRC</i>	
Co. <i>Env. Consultant</i>	Co. <i>LA RWQCB</i>	
Dept.	Phone # <i>213 266 7630</i>	
Fax # <i>(213) 483 6301</i>	Fax # <i>213 266 7600</i>	

October 24, 1994

President  
Products  
Ave.  
CA 91000

SAMPLE

# **COMPLIANCE WITH REQUIREMENT TO OBTAIN COVERAGE UNDER GENERAL INDUSTRIAL ACTIVITIES STORM WATER PERMIT (NPDES No. CAS000001)**

In order to preserve and enhance the water quality and the beneficial uses of the water bodies in our region, the Regional Board adopted a watershed management approach as a comprehensive tool in achieving those objectives. Based on this strategy we are auditing facilities under this Regional Board's jurisdiction with Standard Industrial Classification (SIC) Codes or activities subject to coverage under the General Industrial Activities Storm Water Permit (General Permit). On November 16, 1990, the U.S. Environmental Protection Agency promulgated regulations that require many categories of industrial facilities to apply for a storm water discharge permit by October 1, 1992. On November 19, 1991, the State Water Resources Control Board adopted a statewide General Industrial Activities Storm Water Permit (General Permit), amended on September 17, 1992. To comply with this General Permit each industrial facility is required to file a Notice of Intent (NOI). Permittees are required to develop and use a Storm Water Pollution Prevention Plan (SWPPP) and to monitor storm water leaving the facility.

On a previous inspection performed at your site by the Regional Board's staff it was determined that your facility has to conform with General Permit's requirements. The Standard Industrial Classification (SIC) Code for your operation is xxxx. This SIC is listed as a category xx facility required to apply for the General Permit. Our files indicate that you have not yet submitted an NOI for coverage under the General Permit as required by § 13260 of the California Water Code. You are therefore in violation of § 13260 of the California Water Code. § 13261 and § 13265 of the Water Code provides for significant penalties for violations of the General Permit requirements or for failure to obtain a permit.

Enclosed is a copy of the General Permit which includes an NOI form and instructions. My staff is available to assist you in filling out the form and answer your questions about the stormwater program. You are directed to submit a completed NOI form and appropriate fee within 30 days to the address shown on the General Permit transmittal letter. You must also complete a SWPPP and monitoring program within 90 days of receipt of this letter.

Mr. President  
Products  
Page 2

Your contact for further information and assistance is Mark Pumford, Chief of our Stormwater Unit at (213) 266-7596 or Dan Radulescu at (213) 266-7630.

ROBERT P. GHIRELLI, D. Env.  
Executive Officer

Enclosure

# NOTICE OF INTENT

FOR

## GENERAL PERMIT TO DISCHARGE STORM WATER ASSOCIATED WITH INDUSTRIAL ACTIVITY (WQ Order No. 91-13-DWQ) (Excluding Construction Activities)

002437

4



MARK ONLY  
ONE ITEM

1. ☒ Existing Facility  
2. ☐ New Facility

3. ☐ Change of Information  
WQD # \_\_\_\_\_

### I. OWNER/OPERATOR

Name: Shultz Steel Company	A. Owner/Operator Type: (Check one) 1. <input type="checkbox"/> City 2. <input type="checkbox"/> County 3. <input type="checkbox"/> State 4. <input type="checkbox"/> Federal 5. <input type="checkbox"/> Special District 6. <input type="checkbox"/> Government Combo 7. <input checked="" type="checkbox"/> Private
Mailing Address: 5321 Firestone Blvd.	
City: South Gate	State: CA Zip: 90280-3629 Phone: (213) 564-3281
Contact Person: Steve Shultz	B. 1. <input type="checkbox"/> Owner 2. <input type="checkbox"/> Operator 3. <input checked="" type="checkbox"/> Owner/Operator

### II. FACILITY/SITE INFORMATION

Facility Name: Shultz Steel Company	County: Los Angeles
Street Address: 5321 Firestone Blvd.	Contact Person: Peter Nash: Plant Engineer
City: South Gate	State: CA Zip: 90280-3629 Phone: (213) 564-3281
Parcel Number(s) (If more than 4 apply to facility, enter additional numbers in SECTION IX. A): A. <del>6216-037-03</del> B. 6216-037-020 C. 6216-037-030 D. 6216-036-010	

### III. BILLING ADDRESS

Send Billing Statements To:	A. <input checked="" type="checkbox"/> Owner/Operator	B. <input type="checkbox"/> Facility	C. <input type="checkbox"/> Other (Specify in SECTION IX. B)
-----------------------------	---	--------------------------------------	--

### IV. RECEIVING WATER INFORMATION

A. Does your facility's storm water discharge directly to: (Check one) 1. <input checked="" type="checkbox"/> Storm drain system Owner of storm drain system: (Name) Los Angeles County 2. <input type="checkbox"/> Directly to waters of U.S. (e.g., river, lake, creek, ocean) 3. <input type="checkbox"/> Indirectly to waters of U.S.
B. Name of closest receiving water: Los Angeles River

### V. INDUSTRIAL INFORMATION

A. SIC Code(s): 1. 3460 2. 3460 3. 3460 4. 3460	B. Type of Business: Forging
C. Industrial activities at facility: (Check all that apply) 1. <input checked="" type="checkbox"/> Manufacturing 2. <input type="checkbox"/> Vehicle Maintenance 3. <input type="checkbox"/> Hazardous Waste Treatment, Storage, or Disposal Facility (RCRA Subtitle C) 4. <input checked="" type="checkbox"/> Material Storage 5. <input type="checkbox"/> Vehicle Storage 6. <input checked="" type="checkbox"/> Material Handling 7. <input type="checkbox"/> Wastewater Treatment 8. <input type="checkbox"/> Power Generation 9. <input type="checkbox"/> Recycling 10. <input type="checkbox"/> Landfill 99. <input type="checkbox"/> Other:	

V-52

## VI. MATERIAL HANDLING/MANAGEMENT PRACTICES

### A. Types of materials handled and/or stored indoors: (Check all that apply)

- |  |  |  |  |
|--|--|--|--|
| 1. <input type="checkbox"/> Solvents                   | 2. <input checked="" type="checkbox"/> Scrap Metal | 3. <input type="checkbox"/> Petroleum Products | 4. <input type="checkbox"/> Plating Products       |
| 5. <input type="checkbox"/> Pesticides                 | 6. <input type="checkbox"/> Hazardous Wastes       | 7. <input type="checkbox"/> Paints             | 8. <input type="checkbox"/> Wood Treating Products |
| 99. <input type="checkbox"/> Other (Please list) _____ |  |  |  |

### B. Identify existing management practices employed to reduce pollutants in industrial storm water discharges: (Check all that apply)

- |  |   |  |   |
|--|---|--|---|
| 1. <input type="checkbox"/> Oil/Water Separator          | 2. <input type="checkbox"/> Containment | 3. <input type="checkbox"/> Berms                | 4. <input type="checkbox"/> Leachate Collection |
| 5. <input checked="" type="checkbox"/> Overhead Coverage | 6. <input type="checkbox"/> Recycling   | 7. <input type="checkbox"/> Retention Facilities | 8. <input type="checkbox"/> Chemical Treatment  |
| 99. <input type="checkbox"/> Other (Please list) _____   |   |  |   |

## VII. FACILITY INFORMATION

### A. Total size of site: (Check one)

566,800 ☐ Acres ☒ Sq. Ft.

### B. Percent of site impervious: (Including rooftops)

94 %

## VIII. REGULATORY STATUS (Check all that apply)

A. ☐ Regulated by Storm water Effluent Guidelines (40 CFR Subchapter N)

B. ☐ Waste Discharge Requirements (Order Number) \_\_\_\_\_

C. ☐ NPDES Permit CA \_\_\_\_\_

D. ☐ RCRA Permit Number \_\_\_\_\_

E. ☐ Regulated by California Code of Regulations Article 8, Chapter 15 (Feedlots).

## IX. COMMENTS (Enter additional information for SECTIONS II AND III)

### A. Additional Parcel Numbers:

6216-036-013; 6216-037-022

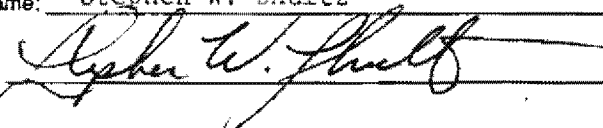
### B. Billing Information: (Enter Name and Address)

Shultz Steel Company 5521 Firestone Blvd., South Gate, CA 90280

## X. CERTIFICATION

"I certify under penalty of law that this document and all attachments were prepared under my direction and supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment." In addition, I certify that the provisions of the permit, including the development and implementation of a Storm Water Pollution Prevention Plan and a Monitoring Program Plan, will be complied with.

Printed Name: Stephen W. Shultz

Signature: 

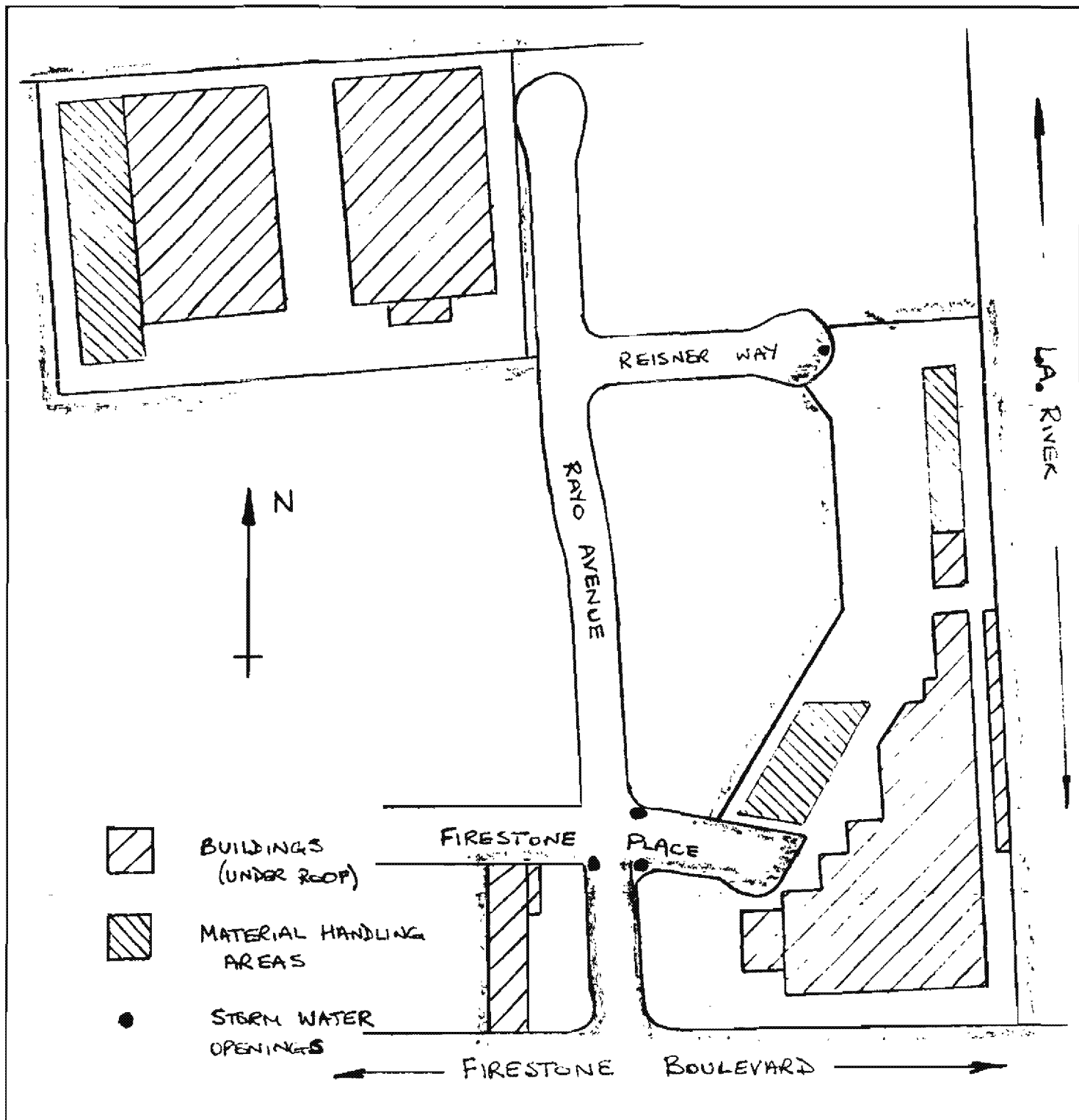
Date: 3/27/92

Title: Vice President

STATE USE ONLY 002437

WDID: 48195	Regional Board Office: 4	Date Permit issued: _____
NPDES Permit Number: CA _____	Order Number: _____	Fee Amount Received: \$ 500
		Date NOI Received: APR 01 1992

NOTICE OF INTENT  
SITE MAP



MAP INFORMATION

TYPE Copied from local parcel map drawings

NUMBER 002437

SCALE 1:2250 (approx)

STATE OF CALIFORNIA  
STATE WATER RESOURCES CONTROL BOARD

FACILITY SHULTZ STEEL COMPANY

COUNTY LOS ANGELES

DATE: 3/27/92

DRAWN: PJN

CHECKED

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—  
LOS ANGELES REGION**

101 CENTRE PLAZA DRIVE  
MONTEREY PARK, CA 91754-2156  
(213) 266-7500

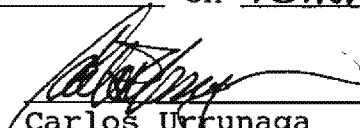


November 15, 1993

To Whom It May Concern:

I, Carlos Urrunaga, employee of the California Regional Water Quality Control Board, Los Angeles Region, do certify that the attached document is a true and correct copy of a Notice of Intent submitted by the Schultz Steel Company.

I declare under penalty of perjury that the above statement is true and correct. Executed at Monterey Park, CA on 15 Nov 1993.

  
\_\_\_\_\_  
Carlos Urrunaga  
Environmental Specialist

To: California Coastal Water Quality Control and  
Los Angeles Region

November 15, 1993

Dear Sirs/Madams,

Haight, Brown, and Bonesteel respectfully requests that you furnish our investigator, Roger E. Bedford, with certified copies of a 3 page document entitled 'notice of intent', number 2437, which was filed on April 1, 1992, by Schultz Steel Company, 5321 Firstone Blvd., South Gate, Ca. 90280

Sincerely,  
Roger E. Bedford

ROGER E. BEDFORD  
INVESTIGATOR

HAIGHT, BROWN & BONESTEEL  
LAWYERS  
(310) 448-6000

1620 25TH STREET  
SUITE 4000 NORTH  
P.O. BOX 680  
SANTA MONICA, CA 90406





# SHULTZ STEEL COMPANY

FAX  
(213) 564-4105  
TELEK  
67-4674

5321 FIRESTONE BOULEVARD  
SOUTH GATE, CALIFORNIA 90280

TELEPHONE  
(213) 564-3281

October 21, 1993

California Regional  
Water Quality Board  
101 Center Plaza Drive  
Monterey Park, CA 91754

Attn: Mr. Carlos Urranaga

Re: Storm Water Report Shultz Steel  
Firestone Facility, 4B19S002437

Dear Mr. Urranaga:

Please find enclosed a copy of our annual report and our storm water pollution prevention plan, dated February, 1993.

If you have any questions please do not hesitate to contact me.

Sincerely,

Peter J. Nash  
Plant Engineer

PJN/eg  
encls.  
93-1090

PLEASE RETURN  
TO CARLOS U.  
AFTER IMPROVING  
INFO D BASE  
THANKS  
Peter J. Nash



"TONS OF QUALITY"



STATE OF CALIFORNIA  
STATE WATER RESOURCES CONTROL BOARD

ANNUAL REPORT  
FOR  
STORM WATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITIES

STATEWIDE GENERAL PERMIT - WQ ORDER NOS. 91-13-DWQ & 92-12-DWQ (NPDES CA000001)  
OR THE  
SANTA CLARA COUNTY GENERAL PERMIT - BOARD ORDER NOS. 92-011 & 92-116 (NPDES CAG12001)

Please provide the following information. *Provide a brief explanation, on a separate sheet(s), to all questions you have answered with a NO response, and to those questions that request additional information. Attach the separate sheets as an addendum to your report.* If you have any questions regarding this report please contact your local Regional Water Quality Control Board (Regional Board), or the State Water Resources Control Board (State Board) (see Attachment I).

This report requires that you provide an accurate and honest assessment of your facility's status of compliance with the storm water program. All incidents of non-compliance are to be reported. Provide a brief explanation of the incident that resulted in the non-compliance. Include in this discussion what you will do, or how you intend to bring your facility into compliance along with a time schedule for implementation of your actions.

This report must be certified and signed, under penalty of perjury, that the information provided in this report is true and complete. The certification must be sign by an appropriate official of your company (see Section C.9).

GENERAL OWNER/FACILITY INFORMATION:

A. Facility WQID No: 4819S002437

B. Facility/Site Information:

Name: SHULTZ STEEL COMPANY County: LOS ANGELES  
Street Address: 5321 FIRESTONE BLVD  
City: SOUTH GATE State: CA Zip: 90280  
SIC Code(s): 3462

Describe your business activities: forging of steel ingots

Mailing Address: 5321 Firestone Blvd  
City: South Gate State: CA Zip: 90280  
Contact Person: Peter Nash Phone: ( 213/357-3277

C. Is your facility part of a Group Monitoring Plan? Yes XX No

If Yes, please answer the following questions:

- What is the Group Monitoring Plan's name:
- Is your facility designated to collect storm water samples? Yes No

D. Has your facility been approved for exemption to storm water sample collection (Section B.9.a,b and c)?  
Yes XX No

If Yes, were you: self-certified certified by a local agency?

Provide the date you submitted your certification to the Regional Board office: \_\_\_\_\_

STATE OF CALIFORNIA  
STATE WATER RESOURCES CONTROL BOARD

ANNUAL REPORT

STATEWIDE GENERAL PERMIT - WQ ORDER NOS. 91-13-DWQ & 92-12-DWQ (NPDES CA000001)  
OR THE  
SANTA CLARA COUNTY GENERAL PERMIT - BOARD ORDER NOS. 92-011 & 92-116 (NPDES CAG12001)

1. Is all the information contained in your NOI current and correct, i.e. facility address, contact name, phone number, etc.? XX Yes      No

If NO, please submit a revised NOI to the State Board with a copy to your Regional Board.

2. Have you prepared a Storm Water Pollution Prevention Plan (SWPPP) as required in Section A of the Permit? XX Yes      No

3. Have you implemented all elements of your SWPPP? XX Yes      No

4. Have all non-storm water discharges been permitted or eliminated (Section A.6)? XX Yes      No

If No, have you reported all the non-storm water discharges to the appropriate Regional Board office?      Yes      No

5. Have you developed a monitoring program as required in Section B of the Permit? XX Yes      No

6. Have you implemented all the elements of your monitoring plan? XX Yes      No

7. Did you conduct an annual site inspection (Section B.5.a)? XX Yes      No

If Yes, what date was it conducted: 5/12/93 and by whom McClaren Hart. Please provide a brief summary of your inspection findings. All areas within plan guidelines.

8. Did you conduct monthly visual wet weather inspections (Section B.5.c)? XX Yes      No

If Yes, please indicate the storm water discharge points that were inspected, and provide the following information for each point: Samples were taken during a minor rainfall event (0.1" per hour) and were not considered representative of facility runoff, however, measured runoff were within plan guidelines.

- Date and time of inspection. Include a sketch or site plan of the facility showing all the points of discharge. Indicate on this sketch or plan which points of discharge were monitored.
- Storm water flow characteristics observed per discharge point. For example was the flow discolored, very turbid; did it have an odor, evidence of floating or suspended material; did it have a sheen; or any other unusual characteristics? If none of these types of flow characteristics were observed, please proceed to the next question. If they were, please discuss the corrective actions taken or to be taken. No corrective action because storm events very light (0.1")

9. Did you conduct dry season site inspections (Section B.5.b)? XX Yes      No

If Yes, please provide the number of storm water discharge points observed, and provide the following for each point:

- a. Date and time of inspection, and a sketch or site map as indicated under question number 8. 5/12/93 - 9:00AM  
b. Was there a dry weather (non-storm water) flow occurring at the time of inspection? No

If yes, please provide the following:

- i. Is the flow subject to a NPDES permit? YesX      No  
If no proceed to item ii. If yes, what is the Board Order No.             , proceed with discussion of next discharge.

- ii. Did you report the non-storm water discharge to the Regional Board? Yes      No  
If no, did you address this flow under Question No. 4? Yes      No If no, revise your answer to No. 4.  
If yes, and you have addressed items iii-v below, proceed with discussion of next discharge. Otherwise amend your answer to No. 4 to include a discussion of items iii-v, and proceed.

- iii. Description of the flow characteristics, i.e. odor, color, etc.

- iv. Possible source of flow.

- v. Corrective action taken. If no action has been taken, please discuss what actions will be taken to eliminate the non-storm water discharge.

ANNUAL REPORT

STATEWIDE GENERAL PERMIT - WQ ORDER NOS. 91-13-DWQ & 92-12-DWQ (NPDES CA000001)  
OR THE  
SANTA CLARA COUNTY GENERAL PERMIT - BOARD ORDER NOS. 92-011 & 92-116 (NPDES CAG12001)

10. On a separate sheet, evaluate the effectiveness of the facility's SWPPP and Best Management Practices (BMPs). Discuss specific areas or elements of the SWPPP that are or are not effective. For plans that were not effective, provide alternatives or proposed revisions to the SWPPP that will be implemented as a result of your monitoring program. Appears effective  
given number of storm events to date, will continue to monitor and update as necessary. Examples of the types of questions this discussion should answer are: Did the SWPPP work? Where did it fail? Are there more discharge points than originally identified? Did the BMPs work effectively; if not why? What types of pollutants are present in the facility's storm water runoff, and what are their potential sources; and did you implement appropriate BMPs to control these pollutants?

11. a. Did you collect storm water samples (Section B.5.d)? X Yes      No

If No, explain way you were unable to collect samples.

b. How many storm water discharge points does your facility have? 4

c. If you collected samples, did you monitor all storm water discharge points (Section B.11)?      Yes X No

If No, have you documented in your monitoring program that the storm water discharges from different locations are substantially identical? XX Yes      No

If No, please update your Monitoring program and provide the documentation as an addendum to this report.

d. Please complete the table provided on Page 5 of this report for each discharge point monitored. You should copy page 5 if you will need additional blank tables. Add to the list of constituents any toxic or other pollutants included in your monitoring program. see lab report dated 12/28/92

e. Is your facility identified under Category 1 of Attachment 1 of the General Permit as a facility that is subject to Federal Effluent Storm Water Guidelines?      Yes X No

If Yes, please provide the following information. If No, please proceed to the next question.

- The Guidelines for your facility are listed in 40 CFR Subchapter N, Part     .

- Were samples collected in accordance with the Federal requirements?      Yes      No

If No, please provide an explanation. If Yes, please answer the following:

Did the sample analytical results indicate that any of the applicable effluent limits had been exceeded?  
     Yes      No

If Yes, please provide the following information for each pollutant exceeding the effluent limitation:

- Storm Water Discharge Point sample collected.
- Constituent analyzed.
- Federal Storm Water Effluent Guideline
- Sample Result
- A brief explanation

12. Do you certify (as indicated on page 4) that, based on your annual site inspection, your facility is in compliance with the requirements of the Permit and your SWPPP? XX Yes      No

STATE OF CALIFORNIA  
STATE WATER RESOURCES CONTROL BOARD

ANNUAL REPORT

STATEWIDE GENERAL PERMIT - WQ ORDER NOS. 91-13-DWQ & 92-12-DWQ (NPDES CA000001)  
OR THE  
SANTA CLARA COUNTY GENERAL PERMIT - BOARD ORDER NOS. 92-011 & 92-116 (NPDES CAG12001)

CERTIFICATION

I am a person duly authorized to sign reports required by the STATEWIDE INDUSTRIAL GENERAL PERMIT or the SANTA CLARA COUNTY GENERAL PERMIT (Section C.9), and I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Printed Name: PETER J. NASH

Signature: 

Date: 9-1-93

Title: PLANT ENGINEER



STATE OF CALIFORNIA  
STATE WATER RESOURCES CONTROL BOARD

ANNUAL REPORT

STATEWIDE GENERAL PERMIT - WQ ORDER NOS. 91-13-DWQ & 92-12-DWQ (NPDES CA000001)  
OR THE  
SANTA CLARA COUNTY GENERAL PERMIT - BOARD ORDER NOS. 92-011 & 92-116 (NPDES CAG12001)

11. d. Sampling Results. Please complete the following table for each discharge point monitored. Add to the list of constituents any toxic or other pollutants included in your monitoring program.

CONSTITUENT	DISCHARGE POINT	TYPE OF SAMPLE <sup>(1)</sup>	DATE & TIME SAMPLE COLLECTED <sup>(2)</sup>	RESULTS <sup>(3)</sup>	LABORATORY DETECTION LIMIT
pH				(pH units)	
TSS				mg/l	
SPECIFIC CONDUCTANCE				µmhos/cm	
OIL & GREASE				mg/l	
TOC				mg/l	
FLOW <sup>(4)</sup> (IF APPLICABLE)				gallons	
SIZE OF STORM (IF AVAILABLE)				inches	
See attached lab report dated			12/28/92	LP6896	

- (1) ENTER IF THE SAMPLE WAS A GRAB (GR) OR COMPOSITE (C); IF THE SAMPLE WAS COLLECTED MANUALLY (M) OR WITH AN AUTOMATIC SAMPLER (AS). IF THE SAMPLE WAS A COMPOSITE PLEASE INDICATE IF IT WAS A TIME (TC) OR FLOW (FC) WEIGHTED COMPOSITE SAMPLE.

A GRAB SAMPLE IS AN INDIVIDUAL SAMPLE COLLECTED IN LESS THAN 15 MINUTES. SECTION 8.12 OF THE PERMIT REQUIRES THAT ALL SAMPLES SHALL BE GRAB SAMPLES UNLESS OTHERWISE APPROVED BY REGIONAL BOARD STAFF, OR IF REQUIRED BY A FEDERAL EFFLUENT GUIDELINE.

A COMPOSITE SAMPLE IS A COMBINATION OF INDIVIDUAL SAMPLES COLLECTED OVER THE SPECIFIED SAMPLING PERIOD; SUCH AS, AT EQUAL TIME INTERVALS, OR AT VARYING TIME INTERVALS SO THAT EACH SAMPLE REPRESENTS AN EQUAL PORTION OF THE CUMULATIVE FLOW. APPROPRIATE TIME INTERVALS ARE SUBJECT TO REGIONAL BOARD STAFF APPROVAL.

- (2) ENTER THE TIME THE SAMPLE WAS TAKEN AND INDICATE HOURS OR MINUTES INTO THE STORM THE SAMPLE WAS COLLECTED.
- (3) IF THE ANALYTICAL RESULTS INDICATE A VALUE LESS THEN THE DETECTION LIMIT (OR NON DETECT), PLEASE SHOW THE VALUE AS LESS THAN THE NUMERICAL VALUE OF THE DETECTION LIMIT.
- (4) DESCRIBE, ON A SEPARATE SHEET, HOW THE FLOW MEASUREMENT WAS CALCULATED. DISCHARGERS SUBJECT TO THE SANTA CLARA COUNTY GENERAL PERMIT ARE REQUIRED TO PROVIDE ESTIMATES OR CALCULATIONS OF THE VOLUME OF STORM WATER DISCHARGE FROM EACH DISCHARGE POINT.

STATE OF CALIFORNIA  
STATE WATER RESOURCES CONTROL BOARD

ANNUAL REPORT

STATEWIDE GENERAL PERMIT - WQ ORDER NOS. 91-13-DWQ & 92-12-DWQ (NPDES CA000001)  
OR THE  
SANTA CLARA COUNTY GENERAL PERMIT - BOARD ORDER NOS. 92-011 & 92-116 (NPDES CAG12001)

SUPPLEMENTAL QUESTIONNAIRE (OPTIONAL)

We have received over 8000 NOIs for coverage under the STATEWIDE INDUSTRIAL GENERAL PERMIT. We have tried to make the program understandable and provide a workable means of implementing a complex set of new regulations. You may wish to spend a few minutes answering the following questions to tell us how we are doing.

You may send this form with your annual report. If you wish to submit it anonymously, please submit it under separate cover.

1. Do you understand the GENERAL PERMIT and what it requires you to do? ☐ Yes ☐ No
2. Do you consider the GENERAL PERMIT an efficient and workable means to comply with the Clean Water Act and the Storm Water Permitting Regulations? ☐ Yes ☐ No
3. Have you had any contact (inspections, informational workshops, telephone inquiries) with staff of the Regional Water Boards or your local storm water management agency? ☐ Yes ☐ No

If Yes, please indicate the type of contact made, and the date (if available) it was made. You may also wish to discuss the context in which the contact was made and if you were satisfied with the help or guidance received in response to your inquiry.

4. Did you (or your accounting office) understand the INVOICE FOR FISCAL YEAR 1992-93 ANNUAL FEE which was mailed in early April of this year? ☐ Yes ☐ No
5. Please use the space provided below (or an attachment) to suggest ways that we can improve and/or streamline our management of this program, or the explain your responses made to the preceding questions.

EMCON  
ASSOCIATES

## FAX COVER PAGE

DATE: 8/27/93 PROJECT NO. DH9300105TO: Carlos Urrunaga - RWQCB FAX NO. (313) 266-7664FROM: Scott Sankey - (818) 841-1160NUMBER OF PAGES: 1 (including cover page)

Unless otherwise indicated or obvious from the nature of the transmittal, the information contained in this facsimile message is confidential information intended for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us at the telephone number listed below. Thank you.

COMMENTS: I would like to know if you have issued a permit for  
stormwater discharge for Shultz Steel, 5321 Firrone Blvd, South  
Gate, Calif. Please call me <sup>today</sup> regarding permit status. If  
a permit exists I would like to schedule time to review  
your file. Thank you for your efforts  
Scott Sankey

Please check one of the boxes below:

Original will follow by: ☐ Regular mail☐ Other \_\_\_\_\_Original will not follow: ☐

ANY QUESTIONS REGARDING TRANSMISSION PLEASE CALL (818) 841-1160  
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3300 N. San Fernando Boulevard, Burbank CA 91504-7894



EMCON  
ASSOCIATES

## FAX COVER PAGE

DATE: 8/24/98 PROJECT NO. DH9300105TO: Carlos Urrunaga - RWBCB FAX NO. (213) 266-7664FROM: Scott Sankey - (818) 841-1160NUMBER OF PAGES: 1 (including cover page)

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COMMENTS: I would like to know if you have issued a permit for  
stormwater discharge for Shultz Steel, 5321 Fircrest Blvd, South  
Gate, Calif. Please call me <sup>today</sup> regarding permit status. If  
a permit exists I would like to schedule time to review  
your file. Thank you for your efforts  
Scott Sankey

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## FAX COVER PAGE

DATE: 8/24/93 PROJECT NO. D149300105TO: Carlos Urrunaga - RWGCB FAX NO. (213) 266-7664FROM: Scott Sankey - (818) 841-1160NUMBER OF PAGES: 1 (including cover page)

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Scott Sankey

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## FAX COVER SHEET

DATE: 8/24/93 PROJECT NO. PH9300105

TO: Carlos Urrunaga - RWGCB FAX NO. (213) 246-7664

FROM: Scott Sankey - (818) 841-1160

NUMBER OF PAGES: 1 (including cover page)

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COMMENTS: I would like to know if you have issued a permit for  
stormwater discharge for Shultz Steel, 5321 Firshire Blvd, South  
Gate, Calif. Please call me <sup>today</sup> ~~me~~ ding permit status. If  
a permit exists I would like to schedule time to review  
your file. Thank you for your efforts.  
Scott Sankey

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## QUALITY CONTROL DEFINITIONS

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**METHOD BLANK RESULTS:** A method blank (MB) is a laboratory generated sample free of any contamination. The method blank assesses the degree to which the laboratory operations and procedures cause false-positive analytical results for your samples.

### LABORATORY CONTROL SPIKES

#### The LCS Program:

The laboratory control spike is a well-characterized matrix (organic pure type II water for water samples and contamination-free sand for soil samples) which is spiked with certain target parameters, and analyzed in duplicate at approximately 5% of the sample load, in order to assure the accuracy and precision of the analytical method.

Control limits for accuracy and precision are different for different methods and may vary with the different sample matrices. They are based on laboratory average historical data and EPA limits which are approved by the Quality Assurance Department.

09/29/93 16:03

NO.395 004

# QUALITY CONTROL REPORT

## METHOD BLANK

Method: Modification B EPA 418.1  
Units: mg/L (ppm)

Date Analyzed: 12/17/92  
Date Extracted: 12/14/92  
Batch Number: 921214-1904

<u>Petroleum Fraction</u>	<u>Reporting Limit</u>	<u>Concentration</u>
Total Recoverable Petroleum Hydrocarbons	2.0	BRL

09/29/93 16:03

NO. 395 005

## QUALITY CONTROL REPORT

Laboratory Control Sample/Laboratory Control Sample Duplicate  
Method 418.1 (Modification B)

LP#: 6896

Analyst: EB

Spike Sample ID: LCSW/LCSDW #9

Date Of Analysis: 12/17/92

Spike ID Code: W2-1412

Instrument #: NICOLET 205

Surrogate ID Code: NA

Batch #: 921214-1904

Matrix: Water Units: mg/L

COMPOUNDS	(a)	(b)	(c)	(d)	(e)	(f)	(g)	ACCEPTANCE LIMITS	
	SAMPLE CONC.	SPIKE CONC.	SAMPLE + SPIKE CONC.	SPIKE REC. %	SAMPLE DUP. + SPIKE CONC.	SPIKE DUP. REC. %	RPD %	% REC	RPD
TPH	0	5.0	4.7	94	4.6	92	2	47-100	≤ 20

$$\text{Spike Recovery} - d = ((c-a)/b) \times 100$$

$$\text{Spike Duplicate Recovery} - f = ((e-a)/b) \times 100$$

$$\text{Relative Percent Difference} - g = (|c-e|)/((c+e) \times .5) \times 100$$

09/29/93 16:04

NO. 395 DOE

**QUALITY CONTROL REPORT**

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**METHOD BLANK**

Method: Metals

Date Analyzed: 12/17/92<sup>a</sup>

Units: ug/L (ppb)

Date Extracted: 12/16/92

Batch Number: 921216-1310<sup>b</sup>

<u>Analyte</u>	<u>Reporting Limit</u>	<u>Results of the MB</u>
Aluminum (Al)/6010	200.	BRL
Chromium (Cr)/6010	10.	BRL
Lead (Pb)/7421	3.0	BRL
Zinc (Zn)/6010	20.	BRL

<sup>a</sup> Applies to all metals except Lead which was analyzed on 12/18/92.

<sup>b</sup> Applies to all metals except Lead which was digested on 12/16/92, Batch # 921216-1309.

09/29/93 16:04

NO.395 007

## QUALITY CONTROL REPORT

Laboratory Control Sample/Laboratory Control Sample Duplicate  
Metals

LP#: 6896

Analyst: RJ

Instrument #: ICP#1

Date of Analysis: 12/17/92

Spike Sample ID: LGSW/LCSDW

Date of Digestion: 12/16/92

Spike ID Code: 4-1467

Batch #: 921216-1310

Matrix: Water Units: ug/L

METALS	(a) SAMPLE CONC.	(b) SPIKE CONC.	(c) SAMPLE + SPIKE CONC.	(d) SPIKE REC.%	(e) SAMPLE DUP. + SPIKE CONC.	(f) SPIKE DUP. REC.%	(g) RPD %	ACCEPTANCE LIMITS	
								REC%	RPD
Al	0	2000.	1910.	96	1990.	100	4	80 - 120	≤20
Cr	0	200.	201.	100	208.	104	3	80 - 120	≤20
Zn	0	500.	481.	96	495.	99	3	80 - 120	≤20

Spike Recovery = d = ((c-a)/b) x 100

Spike Duplicate Recovery = f = ((e-a)/b) x 100

Relative Percent Difference = g = (|c-e|)/((c+e) x .5) x 100



09/29/93 16:05

NO. 395 DEB

## QUALITY CONTROL REPORT

Laboratory Control Sample/Laboratory Control Sample Duplicate  
Metals

LP#: 6896

Analyst: RR

Instrument #: PE5100

Date of Analysis: 12/17/92

Spike Sample ID: LCSW/LCSDW

Date of Digestion: 12/16/92

Spike ID Code: W4-3020

Batch #: 921216-1309

Matrix: Water Units: ug/L

METALS	(a) SAMPLE CONC	(b) SPIKE CONC	(c) SAMPLE + SPIKE CONC	(d) SPIKE REC %	(e) SAMPLE DUP. + SPIKE CONC	(f) SPIKE DUP. REC %	(g) RPD %	ACCEPTANCE LIMITS	
								REC%	RPD
Pb	0	20.0	21.3	106	19.7	98	8	80 - 120	≤20

$$\text{Spike Recovery} - d = ((c-a)/b) \times 100$$

$$\text{Spike Duplicate Recovery} - f = ((e-a)/b) \times 100$$

$$\text{Relative Percent Difference} - g = (|c-e|)/((c+e) \times .5) \times 100$$

09/29/93 16:05

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**ABBREVIATIONS USED IN THIS REPORT**

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BRL	Below Reporting Limit
MB	Method Blank
MS	Matrix Spike
MSD	Matrix Spike Duplicate
LCS	Laboratory Control Spike
LCSD	Laboratory Control Spike Duplicate
RPD	Relative Percent Difference
NS	Not Specified
NA	Not Applicable

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**COMMENTS**

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Test methods may include minor modifications of published EPA methods (e.g., reporting limits or parameter lists). Reporting limits are adjusted to reflect dilution of the sample when appropriate. Solids and waste are analyzed with no correction made for moisture content.

09/29/93 16:06

**TOTAL RECOVERABLE PETROLEUM HYDROCARBONS**

Analytical Method: EPA 418.1  
Preparation Method: Modification B EPA 3510 (a)

Project Name: <u>Schultz Steel</u>	Project Number: <u>030600448.001</u>
Sample Description: <u>Main Gate</u>	Lab Project-ID Number: <u>6896-001</u>
Sample Number: <u>Main Gate</u>	Date Sampled: <u>12/11/92</u>
Date Received: <u>12/14/92</u>	Date Extracted: <u>12/14/92</u>
Date Analyzed: <u>12/17/92</u>	Batch Number: <u>921214-1904</u>

<u>PETROLEUM FRACTION</u>	<u>CONCENTRATION</u> mg/L (ppm)	<u>REPORTING LIMIT</u> mg/L (ppm)
Total Recoverable Petroleum Hydrocarbons	<u>110.</u>	22.

Comments: (a) The sample is not concentrated by Kuderna-Danish.

Due to insufficient sample volume supplied to the laboratory, the established reporting limit was elevated by the ratio of standard volume, 1000 mL, to that of the laboratory provided volume, 900 mL.

The sample was diluted 10 fold to bring target analytes within linear working range.

Approved By: NM  
Nancy McDonald, Quality Control Chemist

Date: 12-28-92

The cover letter and attachments are integral parts of this report.

0806924181bw



09/29/93 16:06

**TOTAL RECOVERABLE PETROLEUM HYDROCARBONS**

Analytical Method: EPA 418.1  
Preparation Method: Modification B EPA 3510 (a)

Project Name: Schultz Steel

Project Number: 030600448.001

Sample Description: Trench

Lab Project-ID Number: 6896-002

Sample Number: Trench

Date Sampled: 12/11/92

Date Received: 12/14/92

Date Extracted: 12/14/92

Date Analyzed: 12/17/92

Batch Number: 921214-1904

<u>PETROLEUM FRACTION</u>	<u>CONCENTRATION</u> mg/L (ppm)	<u>REPORTING</u> <u>LIMIT</u> mg/L (ppm)
Total Recoverable Petroleum Hydrocarbons	21.	2.2

Comments: (a) The sample is not concentrated by Kuderna-Danish.

Due to insufficient sample volume supplied to the laboratory, the established reporting limit was elevated by the ratio of standard volume, 1000 mL, to that of the laboratory provided volume, 900 mL.

Approved By: um  
Nancy McDonald, Quality Control Chemist

Date: 12-28-92

The cover letter and attachments are integral parts of this report.

0806924181bw



09/29/93 16:07

**METALS**

Project  
Name: Schultz Steel

Sample  
Description: Main Gate

Sample  
Number: Main Gate

Date  
Received: 12/14/92

Project  
Number: 030600448.001

Lab Project-  
ID Number: 6896-001

Date  
Sampled: 12/11/92

Date  
Digested: 12/16/92 (a)

Batch  
Number: 921216-1310 (a)

<u>METAL (SYMBOL)/EPA METHOD</u>	<u>DATE ANALYZED</u>	<u>CONCENTRATION</u> ug/L (ppb)	<u>REPORTING</u> <u>LIMIT</u> ug/L (ppb)
→ Aluminum (Al)/6010	12/17/92	2300.	200.
Chromium (Cr)/6010	12/17/92	49.	10.
Lead (Pb)/7421	12/18/92	30.	3.
→ Zinc (Zn)/6010	12/17/92	1700.	20.

Dilution: None

Comments: (a) Applies to all metals except Pb digested on  
12/16/92, Batch # 921216-1309.

Approved By: Nancy McDonald for CM Date: 12-28-92  
Cheryl Matterson, Associate Chemist

The cover letter and attachments are integral parts of this report.

101091MTL20



09/29/93 16:07

NO. 395 P13

## METALS

Project  
Name: Schultz SteelProject  
Number: 030600448.001Sample  
Description: TrenchLab Project-  
ID Number: 6896-002Sample  
Number: TrenchDate  
Sampled: 12/11/92Date  
Received: 12/14/92Date  
Digested: 12/16/92 (a)Batch  
Number: 921216-1310 (a)

<u>METAL (SYMBOL)/EPA METHOD</u>	<u>DATE ANALYZED</u>	<u>CONCENTRATION</u> ug/L (ppb)	<u>REPORTING</u> <u>LIMIT</u> ug/L (ppb)
Aluminum (Al)/6010	12/17/92	2700.	200.
Chromium (Cr)/6010	12/17/92	84.	10.
Lead (Pb)/7421	12/18/92	18.	3.
Zinc (Zn)/6010	12/17/92	460.	20.

Dilution: None

Comments: (a) Applies to all metals except Pb digested on  
12/16/92, Batch # 921216-1309.Approved By: Nancy McDonald for CM  
Cheryl Matterson, Associate ChemistDate: 12-28-92

The cover letter and attachments are integral parts of this report.

101091MTL20





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Address: \_\_\_\_\_

